

POOR QUALITY ORIGINAL

25-10579

101

FILED
CLERK'S OFFICE

1

CORPORATE DISCLOSURE STATEMENT

2

MAR 26 2025

U.S DISTRICT COURT
EASTERN MICHIGAN

3 Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Co-Plaintiff **Students**

4 **Who Oppose Racial Discrimination ("SWORD")** makes the following disclosures:

5 1. SWORD was incorporated under the laws of the state of California, with no
6 parent corporation, subsidiaries, or corporate affiliates.

7 2. SWORD is a nonprofit organization that advocates for equal educational
8 opportunities. Its mission is to stop racial discrimination in college admissions.

9 3. SWORD has no shareholders or equity interests.

10 4. SWORD does not issue stock, and no publicly held corporation owns 10% or
11 more of any interest in SWORD.

12 Respectfully submitted,

13

14 Nan Zhong (Pro Se)

15 211 Hope St #390755

16 Mountain View, CA 94039

17 nanzhong1@gmail.com

18 Dated: Feb 27, 2025

1

EXHIBIT 1

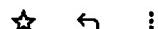
2

EMAIL FROM GOOGLE RECRUITER IN 2019

Hello from Google!

[REDACTED]@google.com>
to me ▾

Tue, May 21, 2019, 10:13AM



Hi Stanley,

I wanted to send you a friendly note and see if you are open to hearing about Software engineering opportunities at Google. We are gearing up for some groundbreaking projects and would love to have a discussion with you.

If you are interested, please let me know what your availability looks like for a 30 minute discussion over the phone.

Warm regards,

[REDACTED]
Google Technical Recruiter
[REDACTED]
careers.google.com

3

Stanley Zhong [REDACTED]
to [REDACTED]

Thu, May 23, 2019, 5:29 PM ☆ ← :

I'm available next week on all of Monday and also on Tuesday after 4pm. I will also be open on Wednesday through Friday after 8pm. My resume can be found here: [https://docs.google.com/document/d/\[REDACTED\]/edit?usp=sharing](https://docs.google.com/document/d/[REDACTED]/edit?usp=sharing). It's also attached to this email.

Just to make sure you know, I'm 13 years old.

Stanley

[Attachment icon] Stanley Zhong's Resume

...

One attachment • Scanned by Gmail ⓘ



[Attachment icon] Stanley Zhong's R... [REDACTED]

[REDACTED]
to me ▾

Mon, May 27, 2019, 1:39 PM ☆ ← :

Thank you for taking the time to put together a resume Stanley! Your competitive programming accomplishments are very impressive. Thanks for being transparent about your age. Due to this factor, we won't be able to visit opportunities at Google. I've uploaded your resume to provide visibility to our intern recruiting team for future follow up. Have a great Memorial Day!

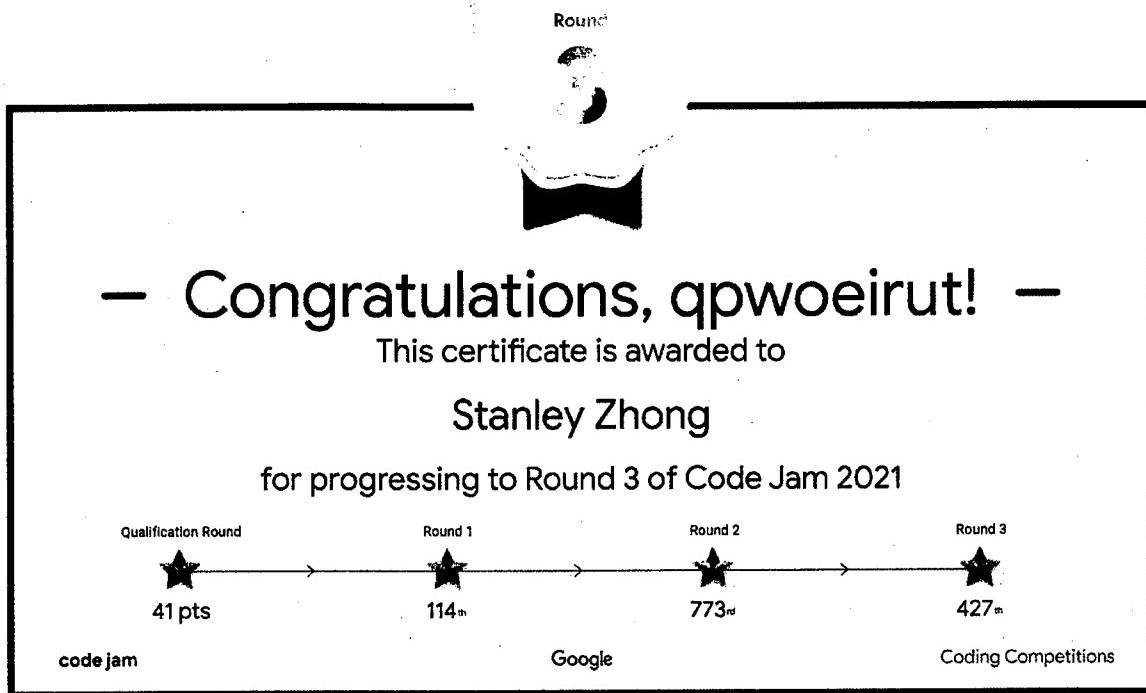
1
...

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EXHIBIT 2

2

STANLEY'S RANKING IN GOOGLE CODE JAM



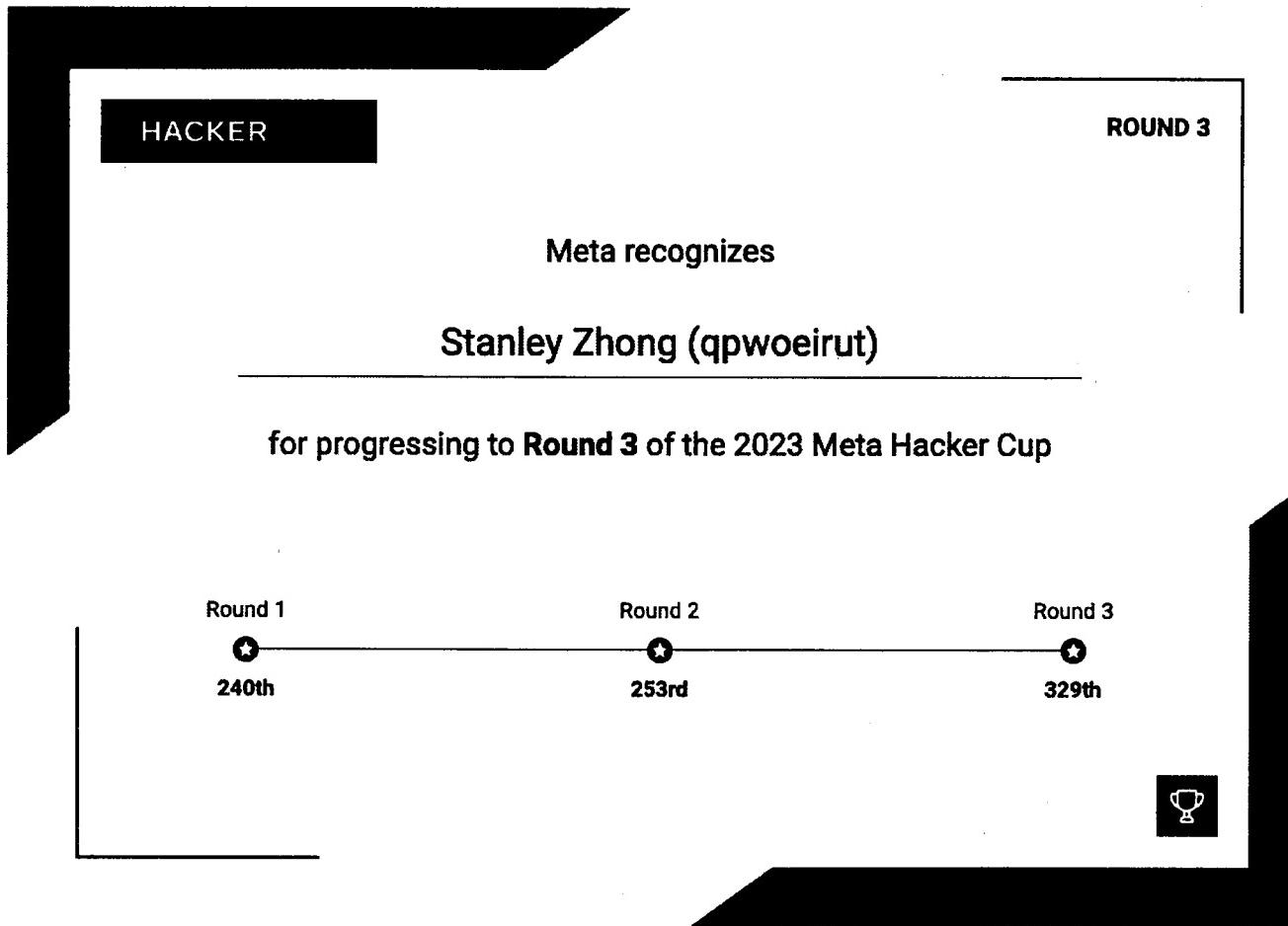
1

EXHIBIT 3

2

STANLEY'S RANKING IN META (FACEBOOK) HACKER CUP

3



1

EXHIBIT 4

2

STANLEY'S RANKING IN MIT BATTLECODE



3

1

EXHIBIT 5

2

STANLEY'S RANKING IN CMU PICOCTF

3

4

2nd place winners! W9 needed



D

[REDACTED]@andrew.cmu.edu>
to [REDACTED] me ▾

✉ Apr 5, 2023, 8:46 AM



Hi Crusaders of redpwn Jr (Stanley Zhong, [REDACTED])

Congrats again on your amazing picoCTF 2023 performance! crusaders of redpwn jr won 2nd place! Your team will be awarded \$2,000, split between each member.

In order to receive your award money, we need each of you to please fill out and return the attached W9 form.

In addition to your prize, we are looking to host an awards ceremony on CMU's campus in Pittsburgh, sometime this summer. Could you please let me know if June 1st would work for you? (Flights and hotels will be paid for by picoCTF)

Best,

[REDACTED]

1

EXHIBIT 6

2

STANLEY'S RANKING IN STANFORD PROCo

CODEFORCES
Sponsored by TON

HOME TOP CATALOG CONTESTS GYM PROBLEMSET GROUPS RATING EDU API CALENDAR HELP RAYAN

I_love_sqrtdecompton TEAMS SUBMISSIONS GROUPS CONTESTS PROBLEMSETTING

I_love_sqrtdecompton's blog

[GYM] Stanford ProCo 2021

By I_love_sqrtdecompton, history, 4 years ago, ←

Hi Codeforces! This weekend we held the Stanford Programming Contest in an online format for USA High-Schoolers. Since it was online, the format allowed for teams of up to 3 members to use 3 total computers and the Internet.

We wanted to share the problems with you, so we added the contest to the gym here. (thanks sqrtdecompton for graciously helping with that). Though it was a contest for high-schoolers, the problems should still be interesting for those below International Grandmaster. Try them out and let us know!

Thanks to all of the other problem writers: SherkockyHolmes, radeye, swagchicken, csullivan203, and xiaowuc1

And testers for excellent feedback: miagkov, gigabuffoon, I_love_Harpe, MTStranger, slusft, and Inutard.

Solution sketches, judge code and data, and the official standings are posted in this google drive. They will later be added to our website as well. Apologies for only having screenshots of the scoreboard in the Drive, I ran into some Polygon issues adding a ranklist but will try to add the official standings to the Gym soon for those doing virtual participations!

Finally, once again congrats to our Advanced division winners!

1. blair blezers: galen_colin, 12tqian, and gabrielwu
2. Coast: rqi, nchn27, and sjplano
3. Alphastar Air: qiangbao, Giantpizzahead, and vroooooom
4. 2 campers 1 cheater: Kininarimasu, SuperJ6, and codetiger927
5. cowng: skittles1412, penguinhacker, and PurpleCrayon
6. drop out of school and run away into the forest with me! qpwoelrut, codicon, and moo.

UPD: Added link to gym: <https://codeforces.com/gym/103091>

UPD2: Created ranklist here, which combines new VPs w/ official standings

▲ +81 ▾ -12

1_love_sqrtdecompton 4 years ago 17

→ Pay attention

Before contest
Codeforces Round 996 (Div. 2)
07:22:57
Register now →
has extra registration

→ Streams

Codeforces Round 996 Solution Discussion
By aryanoc403
Before stream 09:32:57
View all →

→ qpwoelrut

Rating: 2060
Contribution: +36

- Settings
- Blog
- Teams
- Submissions
- Problemsetting
- Groups
- Propose a contest/problems
- Talks
- Contests



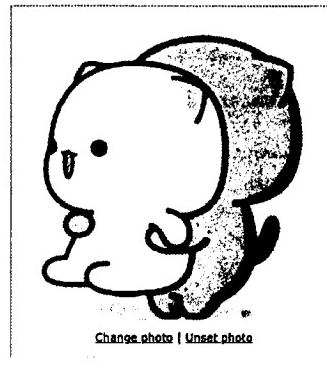
→ Top rated

| # | User | Rating |
|---|-------------|--------|
| 1 | Jangly | 3976 |
| 2 | tourist | 3815 |
| 3 | jodal0815 | 3682 |
| 4 | keun48 | 3614 |
| 5 | orzdevnwang | 3526 |

3

[HOME](#) [TOP](#) [CATALOG](#) [CONTESTS](#) [GYM](#) [PROBLEMSET](#) [GROUPS](#) [RATING](#) [EDU](#) [API](#) [CALENDAR](#) [HELP](#) [RAYAN](#)[SETTINGS](#) [LISTS](#) [BLOG](#) [TEAMS](#) [SUBMISSIONS](#) [GROUPS](#) [MAGIC](#) [CONTESTS](#) [PROBLEMS](#) [SETTING](#)**Candidate Master**
qpwoeirutStanley Zhong, Palo Alto, United States
From [Henry M. Gunn High School](#) **Contest rating: 2060** (max. master, 2291) **Contribution: +36** **Friend of:** 217 users [My friends](#) [Change settings](#) (not visible)**Last visit:** online now**Registered:** 6 years ago [Blog entries \(27\)](#), [comments](#) [Write new entry](#) [View my talks](#)

1

[Change photo](#) | [Upload photo](#)**→ Pay attention****Before contest**[Codeforces Round 996 \(Div. 2\)](#)

07:18:51

[Register now](#) »

has extra registration

→ Streams[Codeforces Round 996 Solution](#)[Discussion](#)By [aryanc403](#)

Before stream 09:28:51

[View all](#) →**→ qpwoeirut** **Rating: 2060** **Contribution: +36**[Settings](#)[Blog](#)[Teams](#)[Submissions](#)[Problemsetting](#)[Streams](#)[Propose a contest/problems](#)[Talks](#)[Contests](#)

qpwoeirut

EXHIBIT 7

STANLEY ADVANCING TO USA COMPUTING OLYMPIAD PLATINUM IN 2021

5 USACO 2021 US OPEN, PLATINUM

The platinum division had 453 total participants, of whom 333 were pre-college students. We saw quite impressive results on the platinum problems in this contest, with several perfect scores. Results for top scorers are [here](#). Congratulations to all of the top participants for their excellent results!

Your score on this contest was **469** (rank **104** among all pre-college participants in this division). Each problem contributed 1000/3 possible points, with equal points assigned to each test case; you can recall your performance on each test case by clicking on a problem below and looking at your results in analysis mode.

1 United Cows of Farmer John

[View problem](#) | [Test data](#) | [Solution](#) | [Your submission](#)

2 Routing Schemes

[View problem](#) | [Test data](#) | [Solution](#) | [Your submission](#)

3 Balanced Subsets

[View problem](#) | [Test data](#) | [Solution](#) | [Your submission](#)

5 USACO 2021 US OPEN, GOLD

The gold division had 856 total participants, of whom 676 were pre-college students. All competitors who scored 750 or higher on this contest are automatically promoted to the platinum division. Detailed results for all those promoted are [here](#).

Your score on this contest was **1000** (rank **1** among all pre-college participants in this division). Each problem contributed 1000/3 possible points, with equal points assigned to each test case; you can recall your performance on each test case by clicking on a problem below and looking at your results in analysis mode.

1 United Cows of Farmer John

[View problem](#) | [Test data](#) | [Solution](#) | [Your submission](#)

2 Portals

[View problem](#) | [Test data](#) | [Solution](#) | [Your submission](#)

3 Permutation

[View problem](#) | [Test data](#) | [Solution](#) | [Your submission](#)

1

EXHIBIT 8

2

NPR NEWS REPORT ABOUT COBOL COWBOYS

3

<https://www.npr.org/2020/04/22/841682627/cobol-cowboys-aim-to-rescue-sluggish-state-unemployment-systems>

4 [h-state-unemployment-systems](#)

n p r KQED

NEWS CULTURE MUSIC PODCASTS & SHOWS SEARCH

SPECIAL SERIES
The Coronavirus Crisis

'COBOL Cowboys' Aim To Rescue Sluggish State Unemployment Systems

APRIL 22, 2020 · 6:17 PM ET

HEARD ON ALL THINGS CONSIDERED

Bobby Allyn

2-Minute Listen + PLAYLIST



5

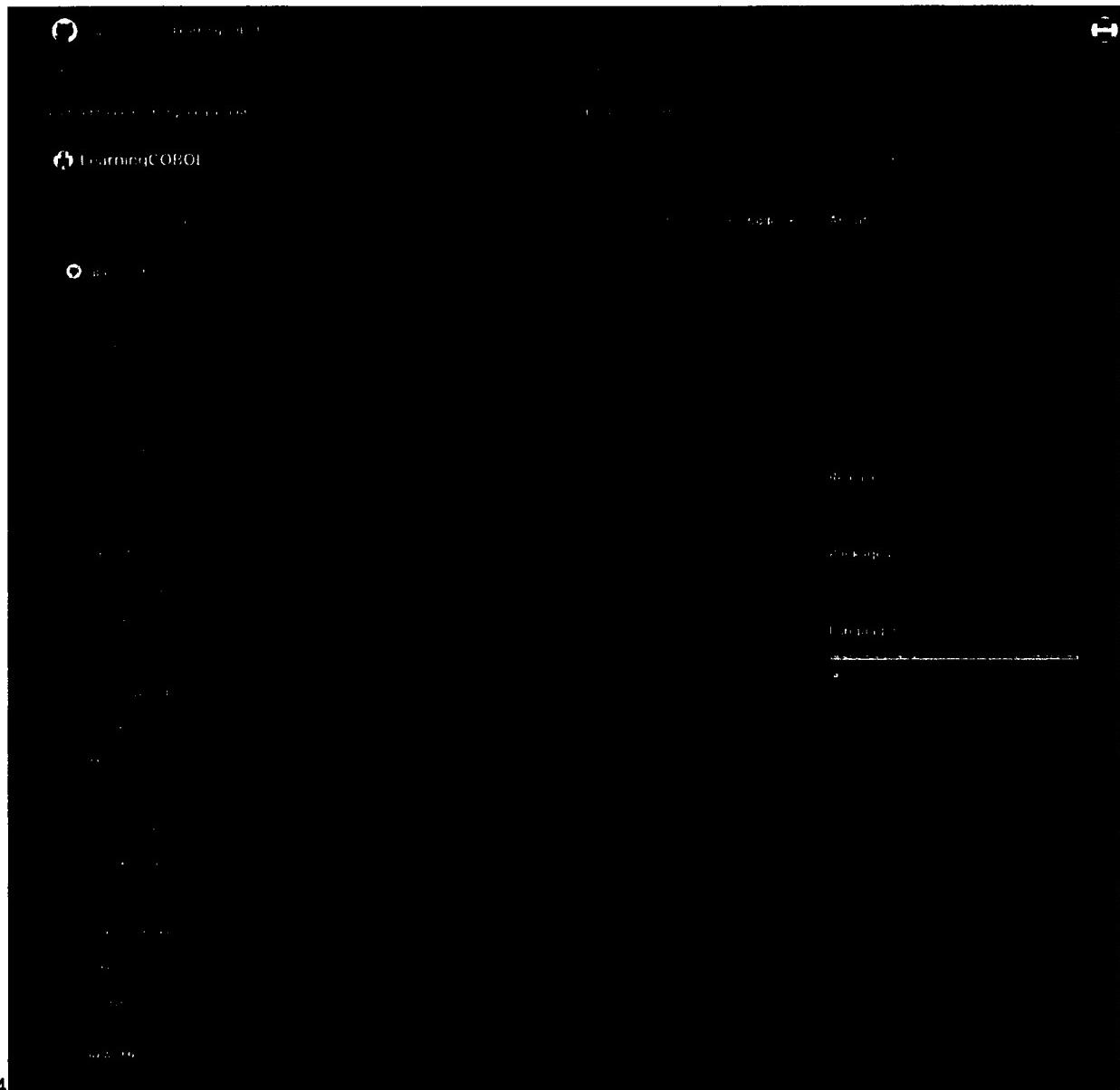
1

EXHIBIT 9

2

STANLEY's COBOL CODE ON GITHUB

3 <https://github.com/qpwoeirut/LearningCOBOL>



4

1

EXHIBIT 10

2

EMAIL EXCHANGE WITH COBOL COWBOYS IN 2020

3

4 On May 25, 2020, at 6:52 PM, YYY <YYY@YYY.com> wrote:

5

6 Dear COBOL Cowboys,

7

8 We hope you are having a wonderful Memorial Day.

9

10 Our names are YYY and Stanley Zhong. We are programming enthusiasts. We
11 became interested in COBOL after learning how the current COVID-19 pandemic
12 has caused issues with outdated COBOL programs. In the last month, we have
13 been learning it to see if we could help. Our code can be found on GitHub here
14 and here.

15

16 We found out about the COBOL Cowboys on the news and saw the work you are
17 doing to help people with their COBOL programs. If possible, we would like to
18 help. Would you be interested in us doing volunteer work for you?

19

20 As a matter of disclosure, we are both 14 years old, but ready and eager to help
21 the world in any way we can.

22

23 YYY and Stanley

1

2 _____

3

4 From: XXX <XXX@cobolcowboys.com>

5 Date: Tue, May 26, 2020 at 12:22 PM

6 Subject: Re: Volunteers Interested in COBOL

7 To: YYY, Stanley

8

9 YYY and Stanley—

10

11 Howdy from Cobol Cowboys!

12

13 Thank you for reaching out and offering your volunteer services. We also

14 appreciate you sending us samples of your code. Good work guys.

15

16 We (Bill Hinshaw, Founder and myself) are intrigued by your interest and would

17 like to have further discussions with both of you.

18

19 An important next step, given your ages, would be to make contact with a

20 parent/guardian. I will need to talk to them on the phone and also get an OK in

21 writing (a quick email is fine) with their written approval for Cobol Cowboys, LLC,

22 to have an introductory teleconference with you both as well as follow-up emails.

23

1 YYY and Stanley, please forward this email to your parent/guardian and ask
2 them to phone me at xxx-xxx-xxxx, so we may proceed. I am available today:
3 now until 7pm and tomorrow through Friday, from 9am to 1pm.

4

5 Please let me know the name of your parent/guardian that will be calling with an
6 approximate time of their call.

7

8 Bill Hinshaw and I look forward to possible future discussions pertaining to
9 COBOL.

10

11 XXX, COO

12 Cobol Cowboys, LLC

13 Cell: xxx-xxx-xxxx

14 Email: XXX@cobolcowboys.com

15

16 not our first rodeo ...

17

18 _____

19

20 Nan Zhong <nanzhong1@gmail.com> Tue, May 26, 2020 at 11:31 PM

21 To: XXX <XXX@cobolcowboys.com>

22 Cc: Stanley, YYY@YYY.com

23

1 Hi XXX,

2

3 I am Stanley's dad. Thanks for your quick response to the boys! I know Stanley
4 was excited to see it.

5

6 Yes, please accept this email as the written approval for Cobol Cowboys, LLC, to
7 have an introductory teleconference with Stanley as well as follow-up emails. I
8 am sure you will hear from YYY's parent soon as well.

9

10 BTW, summer coding job is nothing new to Stanley. He interned at my startup in
11 2018, and programmed (in Python) the backend service (on AWS) that
12 automatically runs insurance quotes. These days he is very much into
13 competitive programming (mostly in C++) and computer security contests.

14

15 YYY and Stanley are school friends. Both live the Bay Area, CA. Based on the
16 NPR news story, I believe you live in Gainesville, Texas, 2 hours ahead of us. If
17 that is correct, can I call you at 11am your time (9am my time) on Wednesday
18 5/27? I will call from my mobile number xxx-xxx-xxxx.

19

20 Looking forward to speaking with you!

21 ,

22 Thanks,

23 Nan

1

2 _____

3

4 XXX <XXX@cobolcowboys.com> Wed, May 27, 2020 at 6:48 AM

5 To: Nan Zhong <nanzhong1@gmail.com>

6

7 Nan—

8

9 9am your time (11amCST) today works fine.

10

11 The work you've described that Stanley has been doing is most impressive.

12 Thanks so much for your email.

13

14 Will talk soon.

15

16 XXX, COO

17 Cobol Cowboys, LLC

18 Cell: xxx-xxx-xxxx

19 Email: XXX@cobolcowboys.com

20

21 not our first rodeo ...

22

1

EXHIBIT 11

2

RABBITSIGN FOUNDED BY STANLEY IN 2021

3 www.rabbitsign.com



Features FAQ Team Contact

Sign Up Log In

Get Unlimited Free E-Signing

Not a free trial. Not a free tier. Completely free. Period.

See how.

Get Started



Won Accolades from Experts

An AWS Well-Architected Review concluded that RabbitSign was "one of the most secure and efficient accounts" reviewed. RabbitSign is in the editorial pipeline to be featured in an AWS case study for its exemplary usage of AWS Serverless and compliance services.

Audited by Trusted Third Parties

RabbitSign has achieved both SOC 2 Type II compliance with an unqualified opinion and ISO 27001:2022 compliance. Sign in to download RabbitSign's compliance reports. Verify RabbitSign's ISO 27001:2022 certification on IAF here.



4

5

6

7

1 <https://blog.rabbitsign.com/launching-an-unlimited-free-e-signing-service-fe77a5>

2 [0a66aa](#)

Medium

 Search

 Write

Launching an Unlimited Free E-Signing Service

 RabbitSign Team · Follow

2 min read · Jun 20, 2021

 56 

RabbitSign!

I'm Stanley, founder of [RabbitSign](#).

The pandemic made e-signing essential. But I got frustrated that all the e-signing solutions had very limited free tiers (or no free tier at all) so I decided to make an unlimited free e-signing solution. This led to the creation of RabbitSign.

3

4

EXHIBIT 12

2 EXCERPT OF THE AWS WELL-ARCHITECTED REVIEW (WAR) FOR RABBITSIGN

- Reducing administrator privileges to follow IAM best practices, protecting themselves from potential insider threats.
- Enabling WAF for CloudFront Distributions, which will help protect Rabbit Sign's web application from common web exploits like SQL injection and cross-site scripting.
- Enabling server-side encryption on their SNS topics for encryption at rest and also enabling delivery status logging, ensuring that their SNS topics are secure and that they can track the delivery status of their messages.

Overall, Cloud303 concluded that Rabbit Sign's account is one of the most efficient and secure accounts they have reviewed. The remediations that were implemented demonstrate Rabbit Sign's commitment to following AWS security best practices. They also ensure the confidentiality, integrity, and availability of data and infrastructure, protecting Rabbit Sign and its customers from potential security threats. Cloud303 believes that this account would be an ideal AWS case study to demonstrate how using serverless infrastructure can help companies operate more cost-efficiently.

[REDACTED]@amazon.com>

Fri, Mar 10, 2023, 4:51PM



Stanley,

I am back from my 2nd ski trip now, yes. Had to head down to CO for [REDACTED]'s birthday and to teach him a few things on the mountain. Glad to hear the feedback after the WAR, that's an accomplishment my man. Cloud 303 correct me if I am wrong but have done more WARs than AWS Partner ever? That's awesome. Throw some time on my calendar for next week and I'll sync up with [REDACTED] on my side. Looking forward to catching up

Schedule 20 Min Meeting w/AWS [REDACTED]



E: [REDACTED]

O: [REDACTED]

Work hard. Have fun. Make history.



1

EXHIBIT 13

2

EMAILS FROM AWS REGARDING THE RABBITSIGN CASE STUDY

3

4

[REDACTED]@amazon.com>
to [REDACTED]

May 8, 2023, 6:24 AM

Great news! The blog proposal has been accepted. @Stanley from RabbitSign I have to get RabbitSign added to our internal reference finder for us to be able to write about their journey – I have submitted this request and will let you know if there is anything I need from you for this.

1

EXHIBIT 14

2

GOOGLE'S FULL-TIME EMPLOYMENT OFFER LETTER

3

4



Stanley Zhong

20 September 2023

This offer supersedes and replaces any prior versions

Dear Stanley,

Thank you for your interest in Google LLC! We are delighted to offer you the exempt position of Software Engineer in the Sunnyvale office. We look forward to working with you!

EXHIBIT 15

- 2 INDUSTRY NEWS COVERAGE FOR RABBITSIGN'S FREE HIPAA-COMPLIANT E-SIGNING
- 3 <https://www.hipaajournal.com/rabbetsign-achieves-hipaa-compliance-for-its-free-e-signing-solution/>
- 4 [e-signing-solution/](https://www.hipaajournal.com/rabbetsign-achieves-hipaa-compliance-for-its-free-e-signing-solution/)



The HIPAA Journal is the leading provider of news, updates, and independent advice for HIPAA compliance.

[Become HIPAA Compliant »](#) [HIPAA News »](#) [HIPAA Compliance Checklist](#) [Latest HIPAA Updates »](#) [HIPAA Training »](#) [About Us »](#)

RabbitSign Achieves HIPAA Compliance for Its Free e-Signing Solution

Posted By [Steve Alder](#) on Sep 8, 2022

RabbitSign, a Palo Alto, CA-based provider of a free-to-use, unlimited e-signing solution, has been assessed by Compliancy Group's HIPAA compliance experts who determined the solution is compliant with the HIPAA Rules.

RabbitSign was devised and developed during the COVID-19 pandemic as a zero-cost e-signing solution for businesses, non-profits, and government entities, with the company providing the solution for the greater good rather than to maximize profits.

All software solutions used by HIPAA-covered entities which come into contact with the protected health information of individuals must support [HIPAA compliance](#). Since the e-signing solution could be used in connection with electronic PHI, RabbitSign would be classed as a business associate under HIPAA if the solution was provided to HIPAA-covered entities.

To broaden its userbase and allow HIPAA-covered entities to use the solution, RabbitSign partnered with Compliancy Group and used the company's HIPAA compliance methodology to take all the necessary steps to ensure compliance with the HIPAA Privacy, Security, Breach Notification, Omnibus Rules, and the HITECH Act. The company's progress toward HIPAA compliance was tracked using Compliancy Group's HIPAA compliance tracking software solution – *The Guard*.



Get The FREE HIPAA Compliance Checklist

Immediate Delivery of Checklist
[Link To Your Email Address](#)

Work Email *



Please Enter Correct Email Address

Your Privacy Respected
[HIPAA Journal Privacy Policy](#)



Get The Free HIPAA Compliance Checklist

[GET THE FREE CHECKLIST](#)

Through that process, which involved a 6-stage risk analysis and remediation program, RabbitSign demonstrated its good faith effort toward HIPAA compliance, and the company was awarded the HIPAA Seal of Compliance, which demonstrates to current and future users of the solution that the company is committed to ensuring the security of ePHI and has an effective HIPAA compliance program in place.

1

EXHIBIT 16

2 EPISODE OF VIEWPOINT WITH DENNIS QUAID FEATURING RABBITSIGN AND STANLEY

3

4 <https://www.viewpointproject.com/features-postid3e6da7a/>

RabbitSign



STANLEY ZHONG

Founder & CEO - RabbitSign

5

6

EXHIBIT 17

STANLEY'S GPA

Henry M. Gunn High Transcript
 School Code: 4332904 Tel: (650)354-8200 Fax: (650)493-7801
 780 Arastradero Rd, Palo Alto, CA 94306

Zhong, Stanley
 Student Number: [REDACTED] Grade: 12
 Generated on 11/27/2022 09:40:33 PM Page 1 of 1

| Student Information | | | #4332904 Henry M. Gunn High | | |
|---|--------|--------|---|---------|--------------------|
| Course | Mark | Weight | Credit | Mark | Weight |
| 2021-2022 Grade 11 Term 2 | | | | | |
| 8638 CS Capstone | A | 5.0000 | 5 | | |
| 1179 Philos Lit | A | 5.0000 | 5 | | |
| 5092 Prnc Of Engr H PLTW | A- | 5.0000 | 5 | | |
| Credit: 30.0000 GPA: 4.6667 U/W GPA: 4.0000 | | | | | |
| GPA Summary | | | #4332904 Henry M. Gunn High | | |
| Cumulative GPA (Weighted) | 4.4242 | | Mark | | |
| Cumulative GPA (Unweighted) | 3.9697 | | Weight | | |
| Weighted 10-12 A-G GPA | 4.5833 | | Credit | | |
| Course | | | #4332904 Henry M. Gunn High | | |
| 0590 PAUSD Summer School | Mark | Weight | Mark | Weight | Credit |
| Course | | | 2021-2022 Grade 11 Term 3 | | |
| 8458 Liv Skill | CR | 5.0000 | 5 | | |
| Credit: 5.0000 GPA: 0.0000 U/W GPA: 0.0000 | | | | | |
| Course | | | In-Progress Courses | | |
| 2019-2020 Grade 09 Term 1 | | | 1525 AnalyticCollWrit | | 5.000 |
| 6205 Art Spec 1 | A | 5.0000 | 2459 AP Calculus BC | | 5.000 |
| 3115 Biology 1A | A | 5.0000 | 1762 AP Human Geography | | 5.000 |
| 4010 Chinese 1 | A+ | 5.0000 | 3859A AP Physics C: Mechanics | | 5.000 |
| 1180 Communic | A | 5.0000 | 2319 AP Statistics | | 5.000 |
| 2408 Geom H | A | 5.0000 | 1811 Econ AP | | 5.000 |
| 2791 PE 9/11 | A | 5.0000 | 0676 Tchr Asst | | 5.000 |
| 1625 Wld Hist | A | 5.0000 | | | |
| Credit: 35.0000 GPA: 4.0000 U/W GPA: 4.0000 | | | | | |
| Course | | | Credit Summary | | |
| 2019-2020 Grade 09 Term 2 | | | Curriculum Program: Gunn Graduation 2018 & Up - | | |
| 6205 Art Spec 1 | CR | 5.0000 | Alg In Middle School | | |
| 3115 Biology 1A | CR | 5.0000 | | | |
| 4010 Chinese 1 | CR | 5.0000 | | | |
| 2408 Geom H | CR | 5.0000 | | | |
| 2792 PE 9/12 | CR | 5.0000 | | | |
| 0117 Western Literature | CR | 5.0000 | | | |
| 1625 Wld Hist | CR | 5.0000 | | | |
| Credit: 35.0000 GPA: 0.0000 U/W GPA: 0.0000 | | | | | |
| Course | | | High School | | |
| 2020-2021 Grade 10 Term 1 | | | Attempted | Earned | Required Remaining |
| 2416 Alg2/TrigH | A | 5.0000 | 10.000 | 10.000 | 10.000 |
| 2491B APCompSci A | A | 5.0000 | USGovt | 5.000 | 5.000 |
| 3625 Chemistry H | A | 5.0000 | Contwid | 5.000 | 5.000 |
| 4020 Chinese 2 | A+ | 5.0000 | USH | 10.000 | 10.000 |
| 1193 Lit Style | A | 5.0000 | Econ | 0.000 | 5.000 |
| 2696 PE 10 | A+ | 5.0000 | S St | 0.000 | 5.000 |
| 1753 US Govt | A+ | 5.0000 | English | 30.000 | 40.000 |
| Credit: 35.0000 GPA: 4.4286 U/W GPA: 4.0000 | | | Algebra | 0.000 | 10.000 |
| Course | | | Geometry | 10.000 | 10.000 |
| 2020-2021 Grade 10 Term 2 | | | Algebra 2 | 10.000 | 10.000 |
| 2416 Alg2/TrigH | A | 5.0000 | Math | 10.000 | 0.000 |
| 2491B APCompSci A | A | 5.0000 | Biol Scl | 10.000 | 10.000 |
| 3625 Chemistry H | A | 5.0000 | Phys Sci | 20.000 | 20.000 |
| 4020 Chinese 2 | A | 5.0000 | World Lang | | |
| 1191 Cont Herit | B+ | 5.0000 | (Level 2) | 10.000 | 10.000 |
| 1641 ContWld 11 | A | 5.0000 | Fine Arts | 10.000 | 10.000 |
| 2696 PE 10 | A | 5.0000 | Career Voc Ed | 30.000 | 30.000 |
| Credit: 35.0000 GPA: 4.2857 U/W GPA: 3.8571 | | | Living Skills | 5.000 | 5.000 |
| Course | | | PE | 20.000 | 20.000 |
| 2021-2022 Grade 11 Term 1 | | | Electives | 10.000 | 45.000 |
| 2399 Analysis H | A+ | 5.0000 | Total | 205.000 | 220.000 |
| 3824 AP Physics 1 | A | 5.0000 | | | |
| 1699 AP US History | A | 5.0000 | | | |
| 8638 CS Capstone | A | 5.0000 | | | |
| 5092 Prnc Of Engr H PLTW | A | 5.0000 | | | |
| 7662 World Classics H | A | 5.0000 | | | |
| Credit: 30.0000 GPA: 4.8333 U/W GPA: 4.0000 | | | | | |
| Course | | | Comments | | |
| 2021-2022 Grade 11 Term 2 | | | This is an UNOFFICIAL transcript | | |
| 2399 Analysis H | A | 5.0000 | | | |
| 3824 AP Physics 1 | A | 5.0000 | | | |
| 1699 AP US History | A- | 5.0000 | | | |

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EXHIBIT 18

2

STANLEY'S QUALIFICATION FOR ELIGIBILITY FOR LOCAL CONTEXT (ELC)

3

How your application is reviewed

University of California Fall Quarter/Semester 2023 application

Application ID:1166008

Name: Stanley Zhong

Campuses review each individual application carefully and consider more than just grades. There are multiple factors that all UC campuses weigh, although campuses often apply these factors differently. To review these factors [↗](#), visit UC's admission website.

You rank in the top 9 percent of California high school students, based on your A-G course totals, UC GPA and our [admissions index](#) [↗](#). If you meet the minimum admission requirements and aren't admitted to any UC campus to which you applied, you will be offered a spot at another campus if space is available.

Return to "Application status"

4

1

EXHIBIT 19

2 HIGH SCHOOL RANKINGS BY US NEWS AND WORLD REPORT

3 [https://www.usnews.com/education/best-high-schools/california/districts/palo-alto-](https://www.usnews.com/education/best-high-schools/california/districts/palo-alto-unified-school-district/henry-m-gunn-high-school-2992)

4 [o-unified-school-district/henry-m-gunn-high-school-2992](#)

5



Henry M. Gunn High School

780 Arastradero Rd., Palo Alto, California | (650) 354-8200 | Award Winning ^①

#135 in National Rankings

Overall Score 99.24/100

[Overview](#) [Student Body](#) [Test Scores](#) [Map](#)

Overview of Henry M. Gunn High School

Henry M. Gunn High School is ranked 14th within California. Students have the opportunity to take Advanced Placement® coursework and exams. The AP® participation rate at Henry M. Gunn High School is 83%. The total minority enrollment is 72%, and 10% of students are economically disadvantaged. Henry M. Gunn High School is 1 of 4 high schools in the Palo Alto Unified School District.

Henry M. Gunn High School 2024 Rankings

Henry M. Gunn High School is ranked #135 in the National Rankings. Schools are ranked on their performance on state-required tests, graduation and how well they prepare students for college. Read more about how we rank the Best High Schools.

All Rankings

- ☛ **#135 in National Rankings**
- ☛ **#14 in California High Schools**
- ☛ **#4 in San Jose, CA Metro Area High Schools**
- ☛ **#38 in STEM High Schools**

| SCORECARD | 99.24 |
|------------------------------|-------|
| Took at Least One AP® Exam | 83% |
| Passed at Least One AP® Exam | 78% |
| Mathematics Proficiency | 82% |
| Reading Proficiency | 87% |
| Science Proficiency | 81% |
| Graduation Rate | 96% |

6

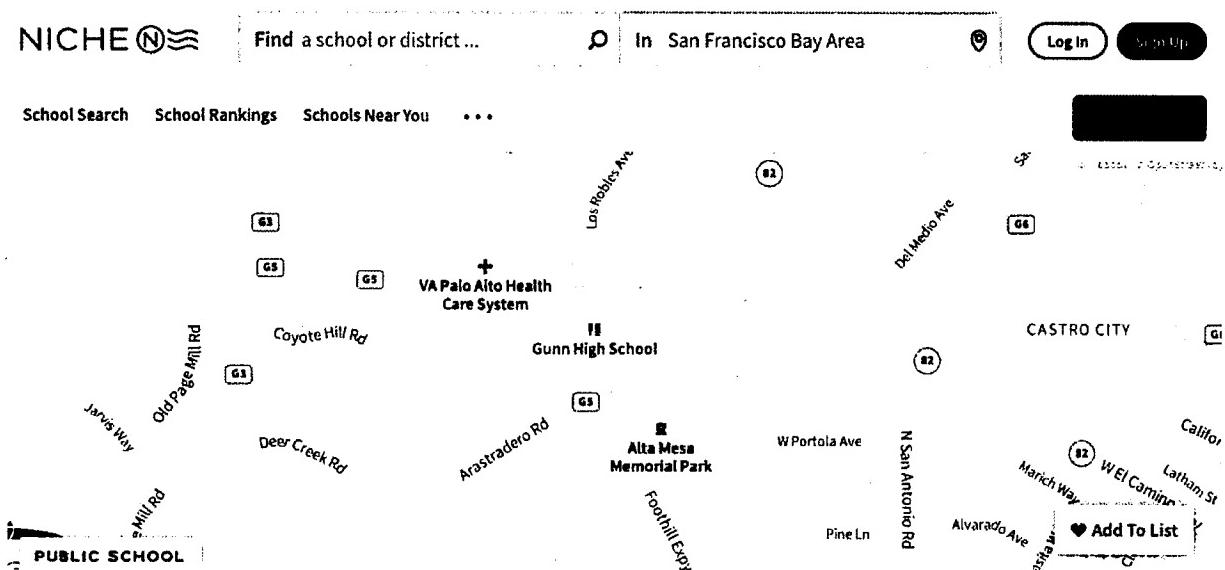
1

EXHIBIT 20

2

HIGH SCHOOL RANKINGS BY NICHE

3 <https://www.niche.com/k12/henry-m-gunn-high-school-palo-alto-ca/>



Palo Alto Unified School District

Henry M. Gunn High School

#1 in Best Public High Schools in San Francisco Bay Area

Overall Grade • Public • 9-12 • PALO ALTO, CA • ★★★★☆ 346 reviews

Report Card

About

Rankings

Academics

Map

Home Listings

Living in the Area

Overall Niche Grade

How are grades calculated?

Data Sources

View Full Report Card ▾

Academics

Teachers

Clubs & Activities

Diversity

College Prep

Administration

4

5

Henry M. Gunn High School

Public • PALO ALTO, CA

 Add To List

Report Card

About

• Rankings

Academics

Map

Home Listings

Living in the Area

Culture & Safety

Students

Teachers

Clubs & Activities

Similar Schools

Reviews

Henry M. Gunn High School Rankings

Niche ranks nearly 100,000 schools and districts based on statistics and millions of opinions from students and parents.

Best Public High Schools
in California

#4 of 2,027

Best College Prep Public
High Schools in California

#8 of 1,598

Best Public High School
Teachers in California

#18 of 1,721

[See All Henry M. Gunn High School Rankings >](#)

Academics

Percent Proficient - Reading 

87%

Percent Proficient - Math 

82%

Average Graduation Rate 

97%

Average SAT 

1430

705 responses

Average ACT 

32

310 responses

AP Enrollment

40%

Popular Colleges

Niche users from this school are most interested in the following colleges.

- | | |
|--|---------------------|
|  University of California - Los Angeles | 483 Students |
|  University of California - Berkeley | 400 Students |
|  University of California - San Diego | 375 Students |

[More >](#)

Niche College Admissions Calculator

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EXHIBIT 21

2

STANLEY'S PSAT AND SAT SCORES

The screenshot shows a user interface for the SAT Suite. At the top, there is a navigation bar with a dropdown menu, a search icon, and a greeting "Hi, Stanley". Below the navigation bar, there are links for "Student Score Reports", "My Score Reports", "Score Sends", and "More". A large, bold, white text "Hi, Stanley." is centered on a black background. Below this, a message reads: "Your 2 score reports are below—your most recent report is at the top. Click any report for more details or to download a copy." Two score reports are displayed:

SAT
December 4, 2021
11th Grade

1590 400 to 1600

Your Evidence-Based Reading and Writing Score Your Math Score
790 200 to 800 **800** 200 to 800

>

PSAT/NMSQT
October 13, 2021
11th Grade

1520 320 to 1520

Your Evidence-Based Reading and Writing Score Your Math Score
760 160 to 760 **760** 160 to 760

>

3

EXHIBIT 22

STANLEY'S NATIONAL MERIT SCHOLARSHIP FINALIST CERTIFICATE



February 13, 2023

STANLEY L. ZHONG

[REDACTED]
PALO ALTO CA 94306

Semifinalist ID #: 23-16372

Selection Unit #: 05-2130

Dear Finalist:

Congratulations! You have advanced to Finalist standing in the 2023 National Merit® Scholarship Program, a distinction that places you in a group of more than 15,000 students, representing less than one percent of U.S. high school graduating seniors. A *Certificate of Merit* attesting to this accomplishment has been sent to your principal for presentation to you.

The National Merit Scholarship Program is privately financed, and the majority of scholarships offered are underwritten by approximately 340 independent sponsor organizations and institutions. Although this nationwide academic competition is the largest of its kind, scholarship funds are limited and only about 7,250 of the Finalists will receive a Merit Scholarship® award.

Three types of National Merit Scholarships will be offered in 2023; no Finalist can receive more than one award.

- All Finalists are being considered for one of the 2,500 single-payment National Merit \$2500 Scholarships that will be offered on a state representational basis.
- Finalists who meet specific criteria of a company or business sponsor will be considered for one of about 950 corporate-sponsored Merit Scholarship awards. Most of these awards are designated for Finalists who are children of a sponsor's employees, but some are offered for residents of areas where the company is located, and a limited number are reserved for students planning to enter career fields a sponsor wishes to encourage.
- Finalists who meet the three conditions *listed on the reverse side of this letter* may be considered for one of about 3,800 college-sponsored Merit Scholarship awards to be financed by U.S. colleges and universities that have made sponsor arrangements with National Merit Scholarship Corporation (NMSC®).

Every Merit Scholarship award must be used for full-time attendance at a college or university in the United States that holds accredited status with a regional accrediting commission on higher education. Our records show that as of January 12, 2023, the regionally accredited U.S. college you reported to NMSC as your first choice is:

Stanford University

Please log in to NMSC's Online Scholarship Application (OSA) to keep your email and mailing addresses up to date throughout the spring. We will begin notifying winners of National Merit Scholarship awards by email in March. Finalists who have not been chosen to receive a Merit Scholarship award will be informed by mail in mid-May after most selections have been completed. All of us associated with the National Merit Scholarship Program salute you for your attainments to date and offer our best wishes for the realization of the high goals you set for yourself.

Sincerely,

James C. Wittenberg
Director of Scholarship Administration

EXHIBIT 23

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2 STANLEY'S ROLE AS A FOUNDING OFFICER AND PRESIDENT OF THE COMPETITIVE PROGRAMMING

3

CLUB AT HIS HIGH SCHOOL

GUNN HIGH SCHOOL – ASSOCIATED STUDENT BODY
Club Meeting Minutes

Club Name: Gunn Competitive Programming Club

The meeting was called to order by: _____

Location: Online over Zoom

Date and Time: September 29th, 2020 at 3:45 pm

The minutes of the previous meeting were: N/A Read and Approved

First Meeting N/A Corrected & Approved (as corrected)

The following requisitions were submitted for approval:

| Vendor | Purpose | Amount |
|------------|------------|------------|
| <u>N/A</u> | <u>N/A</u> | <u>N/A</u> |
| | | |
| | | |
| | | |

Motion: _____ Moved by: _____ Seconded: _____

Communication and Reports: N/A

Old Business: N/A - First Meeting

New Business: Club officers introduced purpose of club presented. List of competitions presented with emphasis on USACO. Lesson on input/output. Example of competitive programming problem given. Signup form to help organize Palo Alto Programming competition shared. Weekly problem displayed. Officers answered some questions and meeting ended.

ATTENDANCE: PLEASE LIST ATTENDEES ON BACK.

Submitted by Club Secretary: Stanley Hung

Date: 10/14/2020

Please continue on back of this form or attach additional information as needed.

EXHIBIT 24

OPENBRACKETS CO-FOUNDED BY STANLEY

3 <https://www.openbrackets.us/>



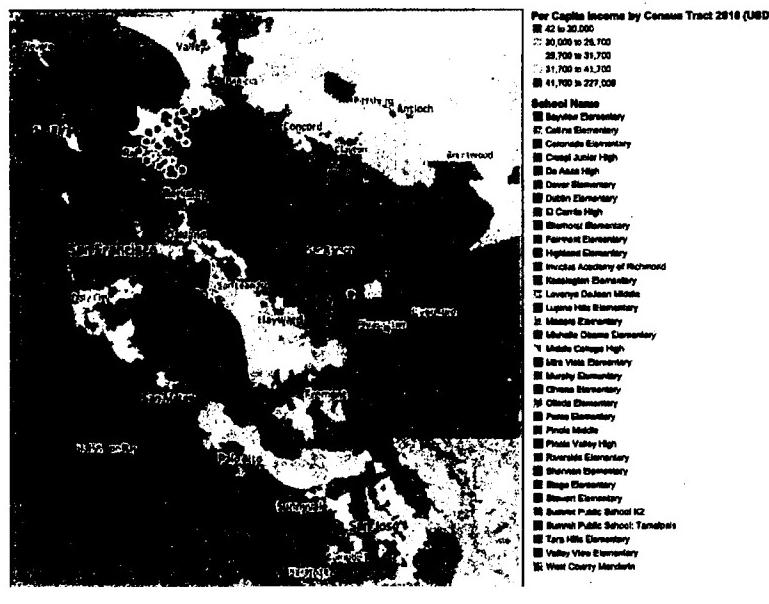
Bridging the Digital Divide

Our Mission

At OpenBrackets, we want to help bridge the digital divide. Inspired by the Black Lives Matter movement in Spring/Summer '2020, we wanted to make an immediate change in our community. Through our courses, we provide support in computer science to middle and high school kids who may not receive it at home, and encourage kids to consider tech as a career, regardless of their background. We also provide students with the opportunity to hear from Guest Speakers in the industry, to see the versatility a computer science foundation can provide. OpenBrackets is run by students, for students.

Impact

Our students come from the following schools. Most of the schools are in low-income areas with a higher percentage of residents of color.



Testimonials

"All your staff were amazing and worked so well with our children considering the circumstances. My son had never done any coding before and not only did he learn so much from this experience but enjoyed his time with you all as well."

"I wanted to thank you all for having this class for our children. Though I know that it was difficult to navigate remotely, my son was still able to get so much out of it. All your staff were amazing and worked so well with our children considering the circumstances. My son had never done any coding before and not only did he learn so much from this experience but enjoyed his time with you all as well. Thank you again for your guidance and patience and for bringing so much joy to our son."

"This was my son's first experience with coding and he has really enjoyed this class. Having this opportunity at no cost was amazing and such a nice addition to a school year that is anything but normal."

"Thank you to everyone involved from OpenBrackets in conducting and offering this opportunity to our children FREE of charge. If it was not for your team, your program and your generosity, I would have never been able to enroll my coding enthusiast daughter in a coding program as they

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EXHIBIT 25

2

STANLEY'S PRESIDENT'S VOLUNTEER SERVICE AWARD

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4 For his volunteer work at OpenBrackets, Stanley received the highest level of
5 PVSA in 2021. His volunteer hours were certified by two adult advisors at
6 OpenBrackets.

1

EXHIBIT 26

2

NEWS REPORTS ON STANLEY'S COLLEGE ADMISSION STORY

3

4 ABC7 Interview of Stanley and Nan on 10/10/2023

5 <https://abc7news.com/stanley-zhong-college-rejected-teen-full-time-job-google-admission/>

6 [ns/13890332/](#)

7 [Bay Area high school grad rejected by 16 colleges hired by Google](#)

8 ABC7 follow-up interview of Stanley on 10/13/2023

9 <https://abc7news.com/high-school-grad-rejected-by-colleges-stanley-zhong-schooler-langs-google-job-bay-area/13909470/>

10 [High school grad rejected by 16 colleges reveals how he got Google job](#)

12 ABC7 follow-up interview of Nan on 10/16/2023

13 <https://abc7news.com/stanley-zhong-google-bay-area-teen-college-admissions-transparency/>

14 [ency/13925114/](#)

15 [Dad of CA teen rejected by colleges but hired by Google calls for admissions transparency](#)

16 [transparency](#)

17 CBS 10/20/2023

18 <https://www.cbsnews.com/news/stanley-zhong-google-software-engineer/>

19

20 CNBC 11/8/2023

21 <https://www.cnbc.com/2023/11/08/dad-of-18-year-old-google-engineer-shares-his-top-pain-renting-rule.html>

1 People 10/20/2023

2 <https://people.com/high-school-graduate-rejected-over-dozen-colleges-lands-jobs-at-google/>

3 [gle-8364398](#)

4 USA Today 10/13/2023

5 <https://www.usatoday.com/story/news/education/2023/10/13/google-hired-high-school-graduate-college-rejection/71166136007/>

6 [ad-colleges-rejections-stanley-zhong/71166136007/](#)

7 Business Today 10/17/2023

8 <https://www.businessstoday.in/technology/news/story/google-vs-college-google-hires-18-year-old-as-software-engineer-after-16-colleges-reject-him-402101-2023-10-16>

10

11 Yahoo News 10/11/2023

12 <https://news.yahoo.com/bay-area-teen-rejected-16-204200918.html>

13

14 Palo Alto Online 10/23/2023

15 <https://www.paloaltoonline.com/news/2023/10/23/from-gunn-to-google-meet-stanley-zhong-the-18-year-old-college-reject-who-landed-every-techies-dream-job>

16 [ng-the-18-year-old-college-reject-who-landed-every-techies-dream-job](#)

17 Sing Tao Daily 10/4/2023

18 https://epaper.singtaousa.com/flippingbook/epaper_sf/2023/20231010/21/

19 World Journal 10/13/2023

20 <https://www.worldjournal.com/wj/story/121469/7504367>

21 <https://www.worldjournal.com/wj/story/121472/7504474>

1

EXHIBIT 27

2

CONGRESSIONAL HEARING CITING STANLEY'S COLLEGE ADMISSION CASE

3

4 <https://www.youtube.com/live/4Zu5cdfv9kk?si=XufizKznBZZlInWo&t=2587>

5



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1 https://democrats-edworkforce.house.gov/imo/media/doc/mike_zhao.pdf

2 (Appendix A, page 4)

Stanley Zhong, an exceptional student rejected by 16 colleges in 2023



- **Academic Performance:** GPA (UW/W): 3.97/4.42. SAT: 1590 & National Merit Scholarship finalist
- **Finalist of major global programming competitions:**
 - Advanced to the Google Code Jam Coding Contest semi-final
 - Led his team to the 2nd place in MIT Battlecode's global high school division (1st place in the US)
- **An Innovator and entrepreneur:** Created an e-signing startup (RabbitSign.com) that's
 - Grown to tens of thousands of users organically.
 - Recognized by an Amazon Web Services Well-Architected Review as "one of the most efficient and secure accounts" they have reviewed.
 - Featured by Amazon Web Services case study for its exemplary use of AWS Serverless and compliance services.
 - Interviewed by Viewpoint with Dennis Quaid, a series of short documentaries on innovations. (past guests included President George H.W. Bush & Fortune 500 CEOs.)
- **Co-founded a non-profit that brought free coding lessons to 500+ kids in underserved communities in California, Washington, and Texas.**
- **Hired by Google (full-time) but rejected by 16 colleges** including Stanford, MIT, CMU, UC Berkeley, UCLA, UC San Diego, UC Santa Barbara, UC Davis, California Polytechnic State University, Cornell, Univ of Illinois, Univ of Michigan, Georgia Tech, CalTech, Univ of Wisconsin, and Univ of Washington.

1

EXHIBIT 28

2

PROTESTS AGAINST SFFA AND RACE-NEUTRAL ADMISSIONS

3 <https://www.harvardmagazine.com/2023/07/rally-against-scotus-admissions-ruling>

4 ng

HARVARD
MAGAZINE

Harvard Students Protest Supreme Court Ruling

With a march and speeches, students vowed to fight back.

by Ryan Doan-Nguyen



At a rally in Harvard Yard on July 1, demonstrators expressed their opposition to the Supreme Court decision ending race-conscious admissions.

5

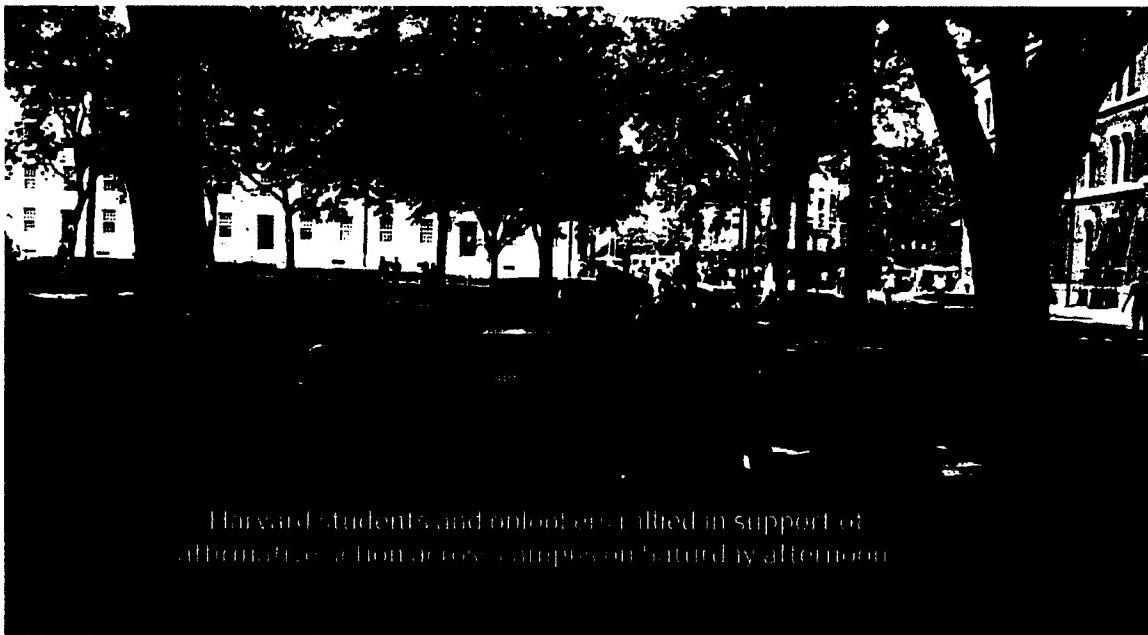
1

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3 <https://www.youtube.com/watch?v=OFN4SeF-Lh4>

4 Harvard Students Rally in Support of Affirmative Action After Supreme Court

5 Ruling



Harvard students and onlookers rallied in support of affirmative action across campus on Saturday afternoon

6

7

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9

10 https://youtu.be/Ruc1BIRvsDo?si=FFkWoJiWy_gmHawn&t=89

11 University of Texas students argue over anti-affirmative action bake sale



1 oh yeah

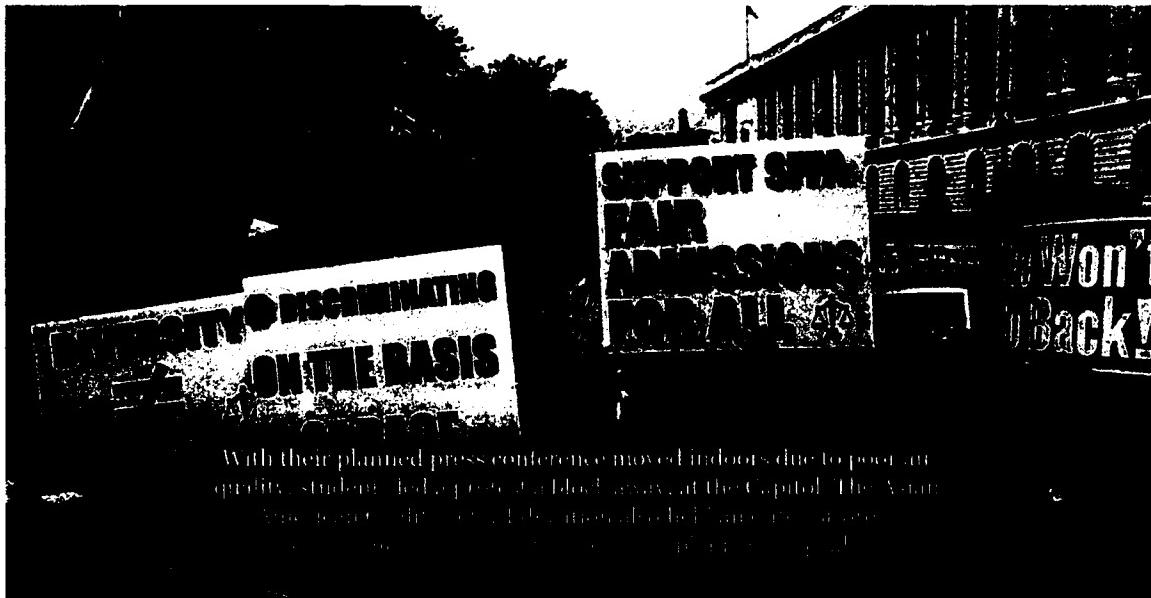
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5 <https://www.youtube.com/watch?v=61ywDq-vEZg>

6 Protesters Clash in Washington After Supreme Court Ends Affirmative Action



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2 <https://www.youtube.com/watch?v=zzeeOBthe9A>

3 Affirmative action supporters rally against Supreme Court ruling in 2005



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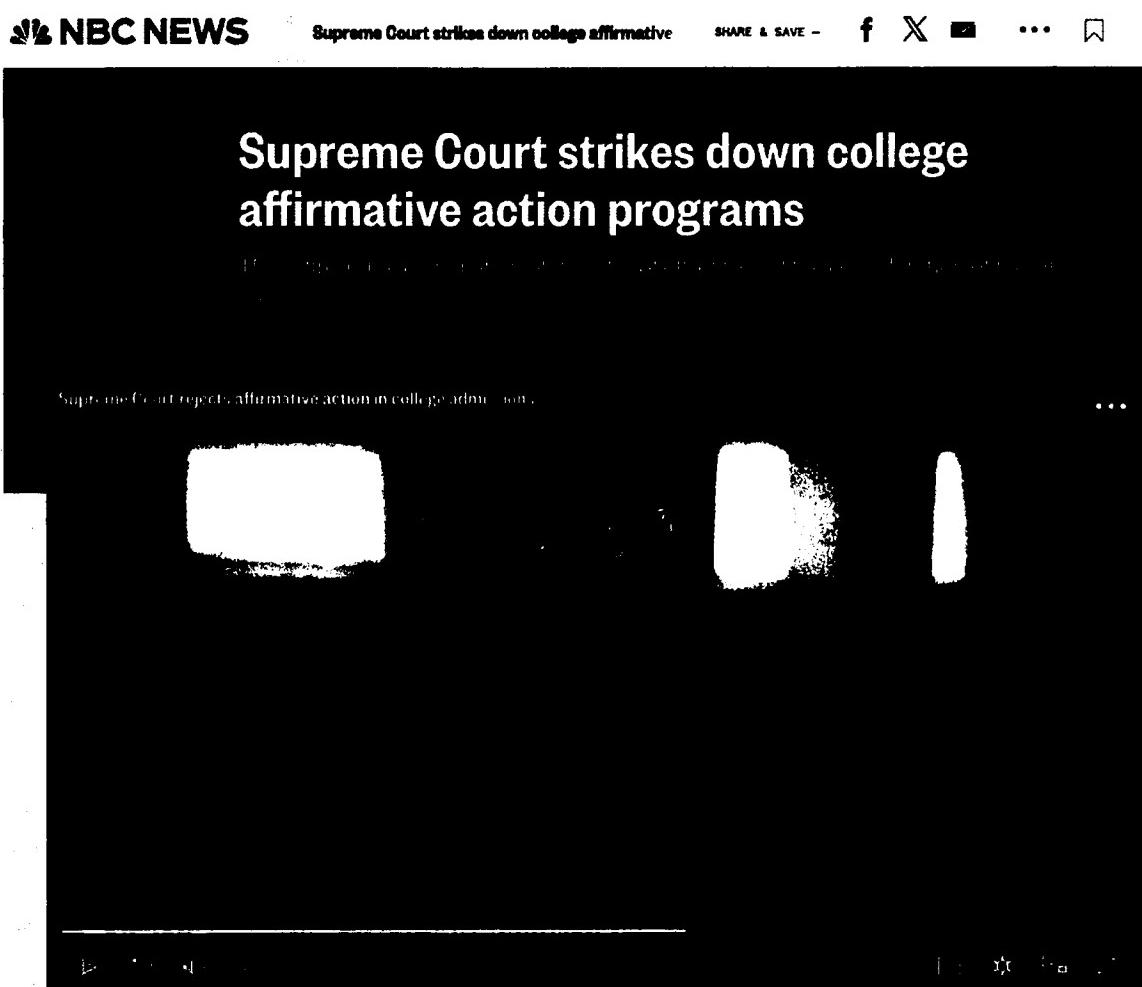
EXHIBIT 29

2 HARVARD THEN-PRESIDENT CLAUDINE GAY RESPONDING TO SUPREME COURT RULING

3 <https://www.nbcnews.com/politics/supreme-court/supreme-court-strikes-affirmative-action-programs-harvard-unc-rcna66770>

4 [e-action-programs-harvard-unc-rcna66770](#)

5 At 1:46 of the video clip



6

1

EXHIBIT 30

2 PROFESSOR JANELLE WONG AND PROFESSOR VIET THANH NGUYEN'S LA TIMES OPINION

3 PIECE

4 <https://www.latimes.com/opinion/story/2023-06-14/affirmative-action-supreme-court-harvard-case-asian-americans>

5 [urt-harvard-case-asian-americans](#)



Los Angeles Ti

LOG IN



Opinion: Affirmative action isn't hurting Asian Americans. Here's why that myth survives



Supporters of affirmative action in higher education rally in front of the U.S. Supreme Court before oral arguments in Students for Fair Admissions vs. President and Fellows of Harvard College and Students for Fair Admissions vs. University of North Carolina on Oct. 31, 2022. (Chip Somodevilla / Getty Images)

By Janelle Wong and Viet Thanh Nguyen

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EXHIBIT 31

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STATE AUDIT OF UC BERKELEY'S ADMISSIONS IN 1987

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4 <https://www.auditor.ca.gov/pdfs/oag/p-722.pdf>

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EXHIBIT 32

2

UC BERKELEY CHANCELLOR'S APOLOGY IN 1989

3

<https://www.latimes.com/archives/la-xpm-1989-04-07-mn-1075-story.html>

4

CALIFORNIA

UC Berkeley Apologizes for Policy That Limited Asians

L.A. Times Archives

April 7, 1989 12 AM PT

 Share

SPECIAL TO THE TIMES

OAKLAND — Seeking to put to rest a five-year dispute, UC Berkeley Chancellor Ira Michael Heyman apologized Thursday for admissions policies that caused a recent decline in Asian undergraduate enrollment and pledged to help change those entrance requirements.

"It is clear that decisions made in the admissions process indisputably had a disproportionate impact on Asians," Heyman said at a press conference here with leaders of the local Asian community. "That outcome was the product of insensitivity. I regret that that occurred."

Heyman said he could not determine whether officials who developed and implemented the admissions policies were intentionally trying to set a ceiling on Asian enrollment, as members of the Asian community have charged.

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EXHIBIT 33

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SURVEY OF COLLEGE ADMISSIONS DIRECTORS

3

4 [https://www.insidehighered.com/news/survey/pressure-build-class-2016-survey-](https://www.insidehighered.com/news/survey/pressure-build-class-2016-survey-admissions-directors)

5 admissions-directors

6

Admissions Directors on Asian-American Applicants

| Statement | Public % Yes | Private % Yes |
|--|-----------------|------------------|
| Do you believe that some colleges are holding Asian-American applicants to higher standards? | 39% | 42% |
| At your college, do Asian-American applicants who are admitted generally have higher grades and test scores than other applicants? | 41% | 30% |

7

EXHIBIT 34

2 FORMER DARTMOUTH ADMISSION OFFICER ON DISCRIMINATION AGAINST ASIANS

3 https://www.huffpost.com/entry/the-ivy-league-asian-prob_b_10121814

From where we sit as advocates for transparency in admissions and as advocates for high school students and their parents, the complaint is valid. I've seen from the inside (as a former admissions officer at Dartmouth College) how even the so-called "holistic process" can discriminate against Asian students. I share some of this insider information here:

Behind the Scenes in an Ivy League Admissions Office. Often high-scoring Asian applicants with top GPA's were seen as "passive," "robotic," and "just another violin/piano playing standout" with "lack of spark." Though I don't think discrimination was intentional, there persisted a stereotype that the majority of Asian applicants were strong in math/science, played the violin or piano at a high level, attended Chinese (or Korean) school on weekends and often did tutoring, Kumon, high level math contests and award-centered activities like Academic Decathlon or Quiz Bowl. At committee discussions, Asian students were often rejected because they "didn't stand out," were "too quiet," "low impact" or "too one-sided."

Having seen this kind of discrimination first-hand working in an Ivy League admissions office, it comes as no surprise that working with students in private consulting for the past 20 years, we've seen continued discrimination. We tell the Asian clients we work with (both US citizens and international students) that it's not good enough to have the "average" Ivy SAT scores of 730 or so - if you are Asian, you have to be well above average (a third party study proved that number was actually 140 points higher than the average for white students) to get into top US Colleges. We also focus our Asian clients on high level reading and vocabulary as the quickest way for Asians to be rejected is a low Critical Reading score on the SAT. Though 800's on the SAT math section is de rigueur, fewer Asian students excel on the Critical Reading section of the SAT. We put our younger students on a strict reading and vocabulary program for this reason. As educators first, we want our students to have college choices, of course, but we also want them to deepen their love of learning and ability to embrace and even enjoy the classics.

EXHIBIT 35

2 EXCERPT FROM THE SFFA'S LEGAL COMPLAINT ABOUT ASIAN-AMERICAN APPLICANTS AND
3 THEIR FAMILIES

E. **Asian-American Applicants And Their Families Know That They Are Being Discriminated Against By Elite Universities.**

262. Asian Americans are not blind to the discrimination employed by Harvard and other elite colleges and universities.

263. According to Princeton economist Uwe Reinhardt, "within the Asian community, of which I'm a part, there's this feeling that, for you to get into Harvard or Princeton, you've got to be better than everybody else."

264. According to Kara Miller, a former Ivy League admissions officer, "Asian kids know that when you look at the average SAT for the school, they need to add 50 or 100 to it. If you're Asian, that's what you'll need to get in."

265. For example, Iris Wang, a senior at Hunter College High School, one of the best public high schools in America, scored a 1520 SAT score and had top grades. Her

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father is a chemist and her mother a postal worker. She was rejected by Harvard, as well as numerous other schools. According to Wang, "All the schools basically say, 'we don't discriminate.' But I went to the Columbia session and they said they value a multicultural community. If they want to be multicultural, there's only so many of one culture they can take."

266. Daniel Golden, the Pulitzer Prize-winning reporter then of *The Wall Street Journal*, described Jamie Lee, who applied to Harvard, as well as six other elite private schools: According to Mr. Golden, "Jamie Lee was a superb student. Born in Hong

EXHIBIT 36

EXCERPT FROM THE SFFA'S LEGAL COMPLAINT ABOUT COLLEGE COUNSELORS

industry knows that." Without affirmative action, "our elite campuses will look like UCLA and Berkeley," and "[t]hat wouldn't be good for Asians or for anyone else."

D. College Counselors Acknowledge Discrimination Against Asian Americans At Elite Universities.

252. College counselors and advisors recognize that discrimination against Asian Americans occurs at elite universities such as Harvard and thus tell Asian Americans to hide their identity, to emphasize personal characteristics that avoid Asian stereotypes, and, in many cases, to lower their expectations and apply elsewhere.

253. For example, the Princeton Review, the leading guide to college admissions, gives specific recommendations for Asian-American students applying to elite schools such as Harvard on how to overcome these schools' anti-Asian-American bias. Its recommendations are both honest and discouraging.

254. According to the Princeton Review: "Asian Americans comprise an increasing proportion of college students nationwide. Many Asian Americans have been extraordinarily successful academically, to the point where some colleges now worry that there are 'too many' Asian Americans on their campuses. Being an Asian American can now actually be a distinct disadvantage in the admissions processes at some of the most selective schools in the country. Increasingly, the standard for affirmative action isn't minority status, but under-represented minority status. Since Asian American populations at many colleges exceed the proportion of Asian Americans to the population of the state or country as a whole, Asian Americans are a minority, but not an under-represented minority, at those colleges.... If you are an Asian American—or even if you simply have an Asian or Asian-sounding surname—you need to be careful about what you do and don't say in your application."

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EXHIBIT 37

2

ASIAN-AMERICAN APPLICANTS TRIED TO APPEAR "LESS ASIAN"

3

https://www.nytimes.com/2022/12/02/us/asian-american-college-applications.html?unlocked_article_code=1.pk4.Oskn.OpS2fQgjTg2C&smid=url-share

4

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The New York Times

Applying to College, and Trying to Appear 'Less Asian'

The affirmative action lawsuit against Harvard seemed to confirm advice given for years to Asian Americans: Don't play chess, don't check the box declaring race.

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When it came time to fill out his college application form, Max Li chose not to declare his race. Even though he knew his last name sounded Chinese, he selected “prefer not to say.”

Clara Chen was advised to avoid the Advanced Placement exam for Chinese because college admissions officers might assume, based on her last name, that she already spoke the language, which could undermine the value of her score. She took the test for Advanced Placement French instead.

When Marissa Li was growing up, she loved playing competitive chess, and spent hours studying the matches of some of her favorite players, like Bobby Fischer. But on her college application, she barely mentioned her interest in the game because she was afraid that it might come across as too stereotypically Asian.

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Sasha Chada, the founder of Ivy Scholars, a college admissions counseling company based in Texas, said that while his company’s Latino clients often emphasized their ethnicity and their engagement with Hispanic cultural organizations on their college applications, his company frequently gave Asian American students the opposite advice, urging them to shift away from “classically Asian activities” to improve their chances of getting into the country’s elite universities.

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EXHIBIT 38

2

ASIAN-AMERICAN ENROLLMENT ROSE AFTER LEGAL PRESSURE

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4 https://asianamericanforeducation.org/en/call_for_complaint_2017_en/

5

□ * After the Student for Fair Admissions filed a lawsuit in 2014 and Asian American Coalition for Education (AACE) filed a joint complaint against Harvard University in 2015, Harvard's admission rate of Asian-Americans jumped from 17% prior 2014 to 22% in 2016.

□ * After a few Asian-American students filed a complaint against Princeton University since 2006, its admission rate of Asian Americans increased from 14.7% in 2007 to 21.9% in 2012 and 25.4% in 2014.

6

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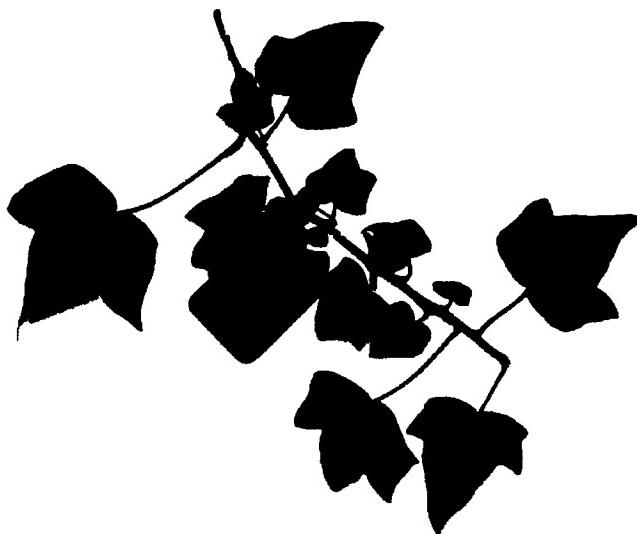
EXHIBIT 39

2

EXCERPT FROM CHAPTER 7 IN *THE PRICE OF ADMISSION*

NATIONAL BESTSELLER

THE PRICE OF ADMISSION



HOW AMERICA'S RULING CLASS
BUYS ITS WAY INTO ELITE COLLEGES—
AND WHO GETS LEFT OUTSIDE THE GATES

WITH NEW REPORTING ON OPERATION VARSITY BLUES

DANIEL GOLDEN

3

7

THE

NEW JEWS

Asian Americans
Need Not Apply

Americans. His parents had gone to college in Korea, ruling out legacy preference for their son in the United States, and they couldn't afford to donate to a university; in fact, Henry applied for financial aid to pay his college tuition.

His Groton guidance counselor knew the score. She discouraged Henry from applying to the Ivy League, telling him it was a long shot at best, and advised him to lower his expectations to second- and third-tier schools. When Henry disregarded her advice, he was spurned by four Ivies—Harvard, Yale, Brown, and Columbia—as well as Stanford University and Massachusetts Institute of Technology. While they rejected Henry, Ivy League universities admitted thirty-four of his Groton classmates. Brown accepted the daughter of a best-selling author; Harvard, the grandson of one of its biggest donors; Columbia, an African American candidate; and Stanford, the daughter of an oil tycoon who chaired the university's board.

"When the decisions came out, and all these other people started getting in, I was a little upset," Henry told me. "I feel I have to hold myself to a higher standard." Added his mother, Suki Park, "I was naive. I thought college admissions had something to do with academics."

Unlike Henry, Stanley Park seemed to have a special hook to bolster his academic credentials, which included a 1500 SAT score. Stanley was born and raised in California, where voters abolished affirmative action in public university admissions in 1996. In the wake of that ban, the University of California, Los Angeles, revamped its admissions criteria to favor students who had conquered "life challenges," such as family illness, being raised by a single parent, or being the first in the family to go to college.

Stanley, who graduated from University High in Irvine in 2002, had overcome more than his share of adversity. After his parents—immigrants of modest means with only high school educations and little English—divorced in 1999, he lived with his mother. When she was diagnosed with breast cancer a year later, he began tutoring children to help pay the rent.

"All the money he earned tutoring was donated to his family," his high school guidance counselor wrote in Stanley's college recommendation. "In the time I have known Stanley I have been impressed with his incredible balance. It's easy to view him as a top mathematics student, but there is so much more to this complex young man that makes him interesting. For the past three years, he has gone to the Bethel Korean Church at 6:30 a.m. every Sunday

morning. Once there, he loads vans with food, and with other church members distributes food to the homeless."

Stanley's own college application essay movingly recounted how his mother's illness had inspired him. "I have the most loving and caring mother anyone can ever have," he wrote. "I admire her so much because she works hard even after her divorce last year. She sacrificed her youth and free time so that I might have a promising future. She went as far as to giving up her whole Christmas bonus to pay for an SAT class. Then something unfair happened to my mother; she was diagnosed with breast cancer. When my mother had her breasts removed, I could visibly see the pain and shame on her face. Although I am very grateful that she is alive, I could not bear to see my mom in that kind of pain. Now that she can't work as hard as she used to, I do not want to let all my mom's past sacrifices for me to be in vain. I slowly realized that the only thing I can do to help out was to make her happy by showing her the fruits of her sacrifices. I began to study harder in school and take my volunteer work... more seriously."

Nevertheless, UCLA and the state university's other elite campus, Berkeley, rejected Stanley while admitting black and Hispanic applicants with far lower scores. Stanley learned the hard way that the "life challenge" preference at his state university was a back-door substitute for affirmative action. It was never meant for him or other Asian Americans at all.

ASIAN AMERICANS are the new Jews, inheriting the mantle of the most disenfranchised group in college admissions. The nonacademic admissions criteria established to exclude Jews, from alumni child status to leadership qualities, are now used to deny Asians. "Historically, at the Ivies, the situation of the Asian minorities parallels very closely the situation of the Jewish minorities a half a century earlier," said former Princeton provost Jeremiah Ostriker.

Once ostracized, Jewish students are now widely coveted for their intellectual prowess. Today, many Jewish applicants have admissions hooks, often as children of alumni, donors, or faculty. Having apologized profusely for restricting Jewish enrollment in the past,

At another mainly Hispanic high school near Los Angeles, Belmont, UCLA student and outreach worker Alex Paredes helped Rosaura Novelo edit her application essay, which appeared tailored to fit the "life challenge" criterion. "It has been difficult for my parents, Mexican immigrants who did not even get to third grade in school, to raise a family of seven," Rosaura's essay began. "My father is the only person in the family who works, getting only minimum wage....Our situation has taught me to appreciate education, learn how to overcome challenges that I have been faced with, and to take advantage of the benefits that come from all my hard work....Taking advantage of the opportunities my parents have provided me with has sometimes been difficult because of all the challenges I have had to overcome....Things have not been handed to me on a silver platter, which makes it challenging for me....My community has also been an obstacle: gangs and violence are an everyday occurrence." UCLA—which took twenty-four Belmont seniors in 2002, tripling the previous year's number—admitted Rosaura despite an SAT score of 980, 520 points below Stanley Park's.

When I dropped by University High in Irvine on the same trip, I found that its admissions to Berkeley and UCLA were plummeting. University High is one of the best public schools in California, with a mean SAT score of 1247 in 2003–4 compared with a state average of 1015. It's also 45 percent Asian American. UCLA admits from University High dropped from 112 in 1998 to 65 in 2004, and Berkeley admits from 91 to 46 over the same period, relegating more University High graduates to less selective campuses such as Riverside and Santa Cruz. As a highly ranked school, University High didn't qualify for University of California outreach, hurting its students' prospects under comprehensive review. In other words, Stanley Park's mother had moved to a cramped Irvine apartment she could barely afford to provide him a better education—and may thereby have thwarted his admission to Berkeley and UCLA.

from rural states, popularized to squelch Jewish applicants from New York City, now hurts Asian students concentrated in metropolitan areas, particularly Los Angeles.

Now as then, a lack of preferences can be a convenient guise for racism. Much as college administrators justified anti-Jewish policies with ethnic stereotypes—one Yale dean in 1918 termed the typical Jewish student a “greasy grind”—so Asians are typecast in college admissions offices as quasi-robots programmed by their parents to ace math and science tests. Asked why Vanderbilt poured resources into recruiting Jews instead of Asians, a former administrator told me, “Asians are very good students, but they don’t provide the kind of intellectual environment that Jewish students provide.”

Similarly, MIT dean of admissions Marilee Jones rationalized the institute’s rejection of Henry Park by resorting to stereotypes. Although she wasn’t able to look up his application because records for his year had been destroyed, “it’s possible that Henry Park looked like a thousand other Korean kids with the exact same profile of grades and activities and temperament,” she emailed me in 2003. “My guess is that he just wasn’t involved or interesting enough to surface to the top.” She added that she could understand why a university would take a celebrity child, legacy, or development admit over “yet another textureless math grind.” College administrators who made such remarks about black or Jewish students might soon find themselves higher education outcasts.

—

“ASIAN AMERICAN” is not an identity deeply rooted in history or tradition. Chinese and Japanese students popularized the term in the 1970s in an effort to be included in affirmative action programs. In 1977, the federal government (which had previously counted immigrants from China, Japan, Korea, and so forth by their countries of origin) introduced “Asian or Pacific Islander” as a data collection category—defined as “a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.”

The strategy worked almost too well. Soaring Asian enrollment soon provoked a backlash. In 1984, with Asian Americans accounting for more than a quarter of its freshman class,

EXHIBIT 40

MR. JOHN MOORES'S ACCUSATION IN *THE PRICE OF ADMISSION*

on her SATs and is the daughter of a struggling Korean-immigrant pastor. "No matter how bad your situation is, someone has it worse."

Asian applicants to Berkeley or UCLA who hadn't confronted a life challenge soon rued this gap in their resumes. Albert Shin, another University High student and the son of an engineer, scored 1540 on his SAT, had a 3.9 grade point average, and could read English, Korean, and Latin. Both Berkeley and UCLA turned him down. "It would be okay to look at social disadvantage a little bit, but judging it more than academics would be wrong," Albert told me. He, Stanley Park, and Hyejin Jae enrolled at the university's San Diego campus. As of March 2006, Stanley Park was a senior bioengineering major with a 3.5 grade point average, and "pretty worried" about admission to medical school. Financial aid and a job as a nuclear medicine assistant at a San Diego hospital had helped pay his tuition.

By 2003, parental complaints that comprehensive review meant rejecting top Asian and white students caught the attention of John Moores, then chairman of the university's board of regents. Studying Berkeley's admissions records, he found that in 2002—the year Albert, Stanley and Hyejin were rebuffed—Berkeley turned down 1,421 Californians with SAT scores above 1,400, including 662 Asian Americans. Of the 359 students accepted with SAT scores of 1,000 or less, 231 were black, Hispanic, or Native American.

The regents chairman accused his flagship campus of "blatantly" discriminating against Asian Americans and denounced comprehensive review as "fuzzy...It's silly to pretend that very low scoring applicants should be admitted to one of America's premier universities with the expectation that somehow these students will learn material that they missed in K-12." University officials disputed Moores's contention, noting that SAT scores are an imperfect measure of academic ability. Still, in April 2004, a university study group compared a statistical model of how the UC admissions process was supposed to work with actual cases. Buried deep inside its report was the finding that "somewhat fewer Asian students, and more African American and Chicano/Latino students (and, in some cases, White students) were admitted" on most campuses than would have been expected. One possible explanation: "small but real racial or ethnic effects on admissions decisions."

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EXHIBIT 41

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PROFESSOR TIM GROSECLOSE'S PROTEST

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4 https://youtu.be/zUsulr1E_6s?si=c7acYOK9LykvZh8a&t=31

- 5 Professor Tim Groseclose talking to media about his observations of UCLA
6 violating Prop 209

7

8 _____

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- 10 <https://dailybruin.com/2012/11/08/submission-faculty-letter-misrepresents-mare-reports-findings>
- 11 Professor Tim Groseclose talking about racial discriminations identified in
12 Professor Robert Mare's reports

COMMUNITY, OPINION

Submission: _Faculty letter misrepresents Mare report's findings_

By Daily Bruin Staff

Nov. 8, 2012 11:53 p.m.

By Tim Grosselose

In an Oct. 30, 2012 Daily Bruin column, a group of 57 professors criticized a Daily Bruin news article

and column, which documented evidence that UCLA is using race in admissions, a violation of Proposition 209.

The 57 faculty also criticized a report by law professor Richard Sander, who described statistical analyses showing that UCLA is using race in admissions.

The 57 professors cite a report by UCLA sociologist Robert Mare. They write that "(Mare's) report found no signs of race-based reader bias in the awarding of applicant holistic scores."

The professors either did not read the Mare report carefully, or they are intentionally trying to misrepresent its findings.

Mare analyzed two major parts of the admissions process: the scores that each applicant receives from two initial reviewers in the first round of the process, and the scores that some applicants receive in "second chance" (Mare's term) reviews by senior admissions staff. The latter reviews include "Final Review," "Supplemental Review," and "School Review."

Sander and Mare found little, if any, evidence of racial bias in the initial reviews. However, both researchers found evidence of bias in the second-chance reviews. Sander was not given data about particular aspects of the second-chance reviews; he could therefore only conclude that the total effect of all aspects of the second-chance reviews contained racial bias. Meanwhile, Mare analyzed each aspect of the second-chance reviews separately.

With the latter analysis at least three of his statistical estimates imply racial bias.

The first of these estimates is the .391 number in column F of his Table 10. Because it is

Editor's Note: Portions of this submission**have been**

,
specifically his analyses of tables in the
Mare report.

The first of these estimates is the .391 number in column F of his Table 10. Because it is positive and statistically significant, this means the following: Suppose you take a black and a white student who are identical on every other variable in Professor Mare's data set. That is, they have identical grades and SAT scores, have parents with identical incomes and educational backgrounds, etc. They're also identical on the "Limits to Achievement" variable that Professor Mare created.

To construct this, Mare recorded such things as whether the applicants' life experience includes homelessness, whether their life experience includes incarceration, whether their life experience includes being a victim of discrimination, and so on.

The .391 number means that the black student has a significantly higher probability of being selected for "Supplemental Review." Remember the two students are identical on everything but race. Thus, it indicates a violation of Prop. 209.

The second of Mare's estimates that implies racial bias is the -.706 number in column G of his Table 10. It indicates the following: suppose you take two students who have been selected for supplemental review.

Suppose one is black and one is white, but otherwise they are identical on all the variables that Professor Mare included in his analysis. The fact that the number is negative (and highly significant statistically) means that the black student is more likely to receive a lower holistic score than the white student. Lower scores are better, which means that the black student is more likely to be admitted. Once again, that's a violation of Prop. 209.

A third estimate by Mare that implies a racial bias is the -.865 number in column D of his Table 10. This number indicates that black students receive significant racial preferences in the "Final Review" stage of the admissions process. (The latter occurs when the scores of two initial readers differ by more than 1.0. When this happens, a senior staff member conducts a third holistic review of the applicant. The applicant's final holistic score is determined by that senior staff member.)

Mare's Table 10 contains eight columns. Five do not show any statistically significant evidence that UCLA is giving racial preferences toward African Americans; however, three do. It is thus false to conclude that Mare found "no signs of race-based reader bias."

Further, when he calculates the net effect of the entire admissions process (that is, all eight aspects, represented by the eight columns of Table 10), Mare finds that the net effect is substantial. Specifically, on page 74, he writes: "Absent the adjusted disparities estimated in this analysis 121 fewer Black applicants would have been admitted, which amounts to approximately 33 percent of the actual number admitted."

The 57 professors also claim the following about Mare's report: "An extensive, independent analysis of UCLA's holistic review process concluded that it works as intended by our faculty."¹

Here, however, is what Mare actually wrote: "The holistic ranking process for freshman admissions at UCLA appears to work much as intended." Note that the 57 professors omitted the word "much."

Again, they either did not read the report carefully, or they are intentionally trying to misrepresent its findings.

Groseclose is a professor of political science.

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EXHIBIT 42

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EXCERPTS FROM PROFESSOR TIM GROSECLOSE'S BOOK *CHEATING*

WITH A FOREWORD BY LARRY EIDER

BY TIM GROSECLOSE
FOREWORD BY LARRY EIDER

**AN INSIDER'S REPORT ON THE USE OF
RACE IN ADMISSIONS AT UCLA**

3

According to Proposition 209, a provision of the California Constitution, public universities cannot use race as a factor in admissions decisions. Meanwhile, students applying to UCLA are asked to check a box that indicates their race. Admissions staff, however, are not allowed to see that information.

But an open secret about admissions is that many students report their race in the essay part of their application. E.g. a student might write, "As a person of color..." or "As a child of Hmong immigrants..." Since admissions staff members read the essays, this gives them a potential backdoor to implement racial preferences.

When the *Los Angeles Times* article appeared, UCLA was using a system in which each applicant was judged across three areas: (i) academic achievement, (ii) personal achievement, and (iii) life challenges. "Academic achievement" was based only on things like grade-point averages and SAT scores. Consequently, the rater of academic achievement did not need to read the personal essays of the applicant. Under the proposed "holistic" system, however, *each reader of an applicant would read the personal essays*. Some people suspected that this was the real intention behind the new system—to allow all readers to see the essays, thus giving them the ability to implement racial preferences.

At the time, I was a member of UCLA's faculty oversight committee for admissions, officially called the Committee on Undergraduate Admissions and Relations with Schools (CUARS). Near the end of the summer, the chair of my committee called a special meeting of which—unprecedented for the committee—the chancellor of the university addressed the committee. According to *UCLA Today*, the Chancellor Norm Abrams began his

speech as follows:

I want to say how much I favor and respect your work here. I don't want to pressure you, but I do want to let you know that we worry about many of the applicants who come to apply to you what we are

CHEATING

hearing from the outside world... several constituencies of UCLA are distressed and upset about the very low numbers of African American freshmen. The political angst and concern is enormous. I don't feel the pressure. I sublimate very well. But there is pressure exerted upon me. The numbers of underrepresented minorities on campus are too small....

And he concluded with the following request:

I ask that you make the whole admissions process holistic. Not only that, I have a further request: This is that you do it quickly and adopt the exact same process that Berkeley currently uses.

After a brief discussion, the committee voted to implement exactly what Chancellor Abrams requested.

Results of the Holistic System

As UCLA began to implement the holistic system, it became clear that its admissions staff was under great pressure to admit more African Americans. Around September, 2006, Chancellor Abrams directed Charles Alexander, the Associate Vice President for Student Diversity at UCLA, to begin attending CUARS meetings. At one of the first few meetings that Alexander attended, the Director of Admissions, Yu Tran, announced that he would soon hire additional readers to evaluate the admissions files that would soon arrive. After Tran made the announcement, Alexander noted that he was concerned about the "demographics" of the readers, and he encouraged Tran to hire more "underrepresented minorities."

TIM GROSICLOSE

Of the students who fell into the above category, the following were the admission rates of African Americans and North Asians, broken down by whether they were rich or poor:

| Group | Admission Rate |
|------------------------|----------------|
| Poor African Americans | 55% |
| Rich African Americans | 38% |
| Poor North Asians | 23% |
| Rich North Asians | 18% |

Note that rich African Americans were admitted much more frequently than poor North Asians.⁵⁸

The following thought experiment helps illustrate just how remarkable these numbers are. Suppose you were a rich North Asian student applying to UCLA, and suppose you learned that your initial evaluators gave you scores of 2.5 and 4.0. Now suppose you're only goal is to maximize your chance of being admitted to UCLA, and suppose a magic genie allows you to change (i) your income status to poor or (ii) your skin color to black. Which would you choose?

It's obvious from the above statistics that you're better off changing your skin color. That raises your probability of admission by 20%—from 18% to 38%. By contrast, if you change your income status, that raises your probability of admission only 5%—from 18% to 23%.

The change in skin color would give you four times the advantage that you'd receive from changing your family income. Although this is only a rough measurement, it suggests that, at least in part of its admissions process, the degree to which UCLA shows racial preferences is about four times the degree to which it shows class-based preferences—even though the former is illegal and the latter is legal.

1

EXHIBIT 43

2 **UCLA MEDICAL SCHOOL'S ASIAN ENROLLMENT DECLINED 35% FROM 2019 TO 2022**

3 [https://www.latimes.com/business/story/2024-05-30/is-ucla-a-failed-medical-sch](https://www.latimes.com/business/story/2024-05-30/is-ucla-a-failed-medical-school-declined-35-from-2019-to-2022)

4 [ool-debunking-a-dumb-right-wing-meme](#)

5

6 <https://www.yahoo.com/news/column-ucla-failed-medical-school-130036473.htm>

7 |

(As for a case Sibarium mentions in which Lucero supposedly pushed to admit a Black student whose grades and test scores were below the UCLA average, he doesn't say whether the student was admitted.)

It's true that the entering medical school class at UCLA has become more diverse over time. Figures issued by UCLA and published by the Beacon show that from 2019 through 2022, the number of whites in the 173-member class declined to 46 from 49, the number of Black students rose to 25 from 22, Hispanic students rose from 25 to 37, a catchall "other" category grew to 20 from eight, and American Indians, Hawaiians and other Pacific Islanders went from zero to three. The number of Asian students declined to 55 from 84.

Does this validate the article's assertion, voiced by an anonymous source (of course), that "a third to a half of the medical school is incredibly unqualified"?

The math doesn't pencil out. As blogger and statistics maven Kevin Drum notes, given that the number of nonwhite and non-Asian students increased by only 30 in three years, even if "every single one of these students was woefully unqualified, that's about 17% of the class. How do you get from there to 'a third to a half'?"

By the way, the median grade-point averages and scores on the Medical College Admission Test of accepted applicants haven't declined at all since 2020 — the MCAT average in 2023 was the same as in 2020, and the GPA rose by a hair.

In emails to the medical school class, Dubinett and his fellow deans have reinforced their commitment to merit-based admissions and diversity training. "Students and faculty members are held to the highest standards of academic excellence," they wrote. "Highly qualified medical students and trainees are admitted ... based on merit in a process consistent with state and federal law." That said, "we are enriched by the diverse experiences each of you brings to our community."

UCLA, then, is standing firm against the right wing's drive to pretend that racial and ethnic discrimination doesn't exist in our society and to undermine efforts to wipe it out. Would that more institutions took that stand, instead of capitulating to a dishonest, braying mob.

This story originally appeared in Los Angeles Times.

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EXHIBIT 44

2

THE MICHIGAN MANDATE

3 <https://michigantoday.umich.edu/2024/05/17/michigans-affirmative-action-debate/>

Michigan's affirmative action debate

May 17, 2024

Written By James Tobin



'A blueprint for fundamental change'

To settle the Black Action Movement strike in 1970, the University promised enough financial aid to raise Black enrollment to 10 percent. The aid promise was kept, but Black enrollment rose only by small increments through the 1980s. So, Black students and their supporters insisted that U-M do more.

In 1988, President James J. Duderstadt introduced the Michigan Mandate, "a blueprint for fundamental change in the ethnic composition of the university community." Its thesis: Cultural diversity and a high-quality education were intimately linked.

4

This story completes the two-part feature
Thirteen days in 1970

5

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3 <https://deepblue.lib.umich.edu/handle/2027.42/58612>

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/ View Item

The Michigan Mandate: A Strategic Linking of Academic Excellence and Social Diversity

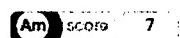
Duderstadt, James J.

1990-03

View/Open

[Michigan Mandate 1990.pdf](#)

 (6MB PDF)



Abstract

The University of Michigan is firmly convinced that our institution's ability to achieve and sustain a campus community recognized for its racial, cultural, and ethnic diversity will in large part determine our capacity to serve successfully our state and nation and the world in the challenging times before us. [less]

Publisher

University of Michigan

Subjects

Michigan Mandate
Diversity
Duderstadt

4

EXHIBIT 45

BROWN UNIVERSITY MEDICAL SCHOOL FACULTY PROMOTION CRITERIA

3 <https://brownmedicine.org/3/wp-content/uploads/2023/06/Promotion-Criteria-and->

4 [DOM-guidelines-for-Senior-Ranks.pdf](#)

Major Criterion: Demonstrated commitment to diversity, equity, and inclusion

2. Effort toward advancing diversity, equity, and inclusion in at least one area for which candidate is evaluated.
 - e. Research
 - f. Teaching
 - g. Clinical care
 - h. Service.

Minor Criterion: Exceptional clinical skills

Evidence of outstanding clinical ability

EXHIBIT 46

2 **UCLA MEDICAL SCHOOL'S RACE-BASED FELLOWSHIP PROGRAM**

- 3 The Dean of UCLA Medical School says it does not discriminate based on race.
- 4 His own research center runs a Fellowship program (named 'iDIVERSE') that
- 5 barred white and Asian researchers from applying.
- 6 [https://freebeacon.com/campus/the-dean-of-ucla-medical-school-says-it-does-n
ot-discriminate-based-on-race-his-own-research-center-runs-a-minorities-only-fe
llowship/](https://freebeacon.com/campus/the-dean-of-ucla-medical-school-says-it-does-not-discriminate-based-on-race-his-own-research-center-runs-a-minorities-only-fellowship/)

DEADLINES

IDIVERSE FELLOW OPPORTUNITY
DEADLINE: MARCH 01, 2024 05:00 PM

Save this event to your calendar.

Integrated Community Engaged, mHealth, and Data Science to Enhance Clinical Trial Diversity and Cardiometabolic Health (IDIVERSE) Fellow

Eligibility criteria below:

- Located at the University of California Los Angeles
- 2-year appointment and dedicate at least 75% FTE to research
- Must be from a racial or ethnic group that is under-represented in science (Black/African-American; Hispanic/Latino; Native American or Alaska Native; and/or Hawaiian or other Pacific Islander) or an LGBTQ+ person or a woman
- Completed their terminal degree (or switched career paths and have received another terminal degree in a different field – MD, PhD, DO, PharmD, etc) within 5 years is eligible. Training and non-terminal degrees (MPH, MS, etc) are not consideration for eligibility. Those who received their terminal degrees outside of 5 years are ineligible, regardless of additional degrees or training.

Applying to IDIVERSE:

Individuals interested in being an AHA IDIVERSE fellow or would like more information on the program, please contact Jachael Gardner (jgardner@mednet.ucla.edu)

1

EXHIBIT 47

2

UC ADMISSION READER'S OPINION PIECE IN NEW YORK TIMES

3

https://www.nytimes.com/2013/08/04/education/edlife/lifting-the-veil-on-the-holistic-process-at-the-university-of-california-berkeley.html?unlocked_article_code=1.6

4

[Ew.hDKN.WtxDzNosRmxO&smid=em-share](#)

6

≡ The New York Times

EDUCATION LIFE Confessions of an Application Reader

After the next training session, when I asked about an Asian student who I thought was a 2 but had only received a 3, the officer noted: "Oh, you'll get a lot of them." She said the same when I asked why a low-income student with top grades and scores, and who had served in the Israeli army, was a 3.

7

≡ The New York Times

EDUCATION LIFE Confessions of an Application Reader

Officially, like all readers, I was to exclude minority background from my consideration. I was simply to notice whether the student came from a non-English-speaking household. I was not told what to do with this information — except that it may be a stressor if the personal statement revealed the student was having trouble adjusting to coursework in English. In such a case, I could refer the applicant for a special read.

Why did I hear so many times from the assistant director? I think I got lost in the unspoken directives. Some things can't be spelled out, but they have to be known. Application readers must simply pick it up by osmosis, so that the process of detecting objective factors of disadvantage becomes tricky.

It's an extreme version of the American non-conversation about race.

8

When the invitation came to sign up for the next application cycle, I wavered. My job as an application reader — evaluating the potential success of so many hopeful students — had been one of the most serious endeavors of my academic career. But the opaque and secretive nature of the process had made me queasy. Wouldn't better disclosure of how decisions are made help families better position their children? Does Proposition 209 serve merely to push race underground? Can the playing field of admissions ever be level?

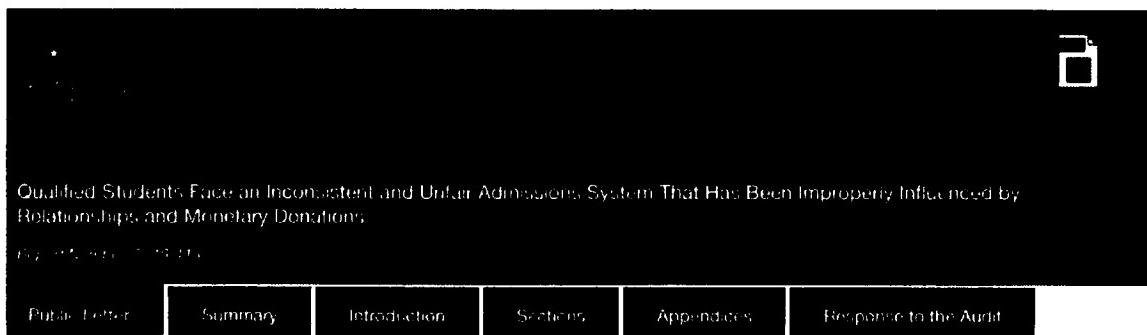
For me, the process presented simply too many moral dilemmas. In the end, I chose not to participate again.

Ruth A. Starkman teaches writing and ethics at Stanford and, from 1992 to 1996, taught writing at the University of California, Berkeley.

EXHIBIT 48

2 CALIFORNIA STATE AUDITOR'S REPORT ON UC'S ADMISSIONS IN 2020 - SECTIONS

3 <https://information.auditor.ca.gov/reports/2019-113/index.html>



**September 22, 2020
2019-113**

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As directed by the Joint Legislative Audit Committee, my office conducted an audit of the University of California's (university) admissions process. Our review assessed the risk for fraud and inappropriate admissions activities at four campuses and we conclude that the university has allowed for improper influence in admissions decisions, and it has not treated applicants fairly or consistently.

From academic years 2013–14 through 2018–19, we found the four campuses we reviewed—UC Berkeley, UCLA, UC San Diego, and UC Santa Barbara—unfairly admitted 64 applicants based on their personal or family connections to donors and university staff. Campuses admitted 22 of these students through their student-athlete admissions processes, even though the students did not have the athletic qualifications to compete at the university. UC Berkeley admitted the remaining 42 students, most of whom were referred to the admissions office because of their families' histories as donors or because they were related or connected to university staff, even though their records did not demonstrate competitive qualifications for admission. By admitting 64 noncompetitive applicants, the university undermined the fairness and integrity of its admissions process and deprived more qualified students of the opportunity for admission.

The university has also failed to ensure that campuses fairly and consistently treat the thousands of prospective students who apply each year. Neither UC Berkeley nor UCLA have developed methodologies for how they determine which applicants to admit. Nevertheless, both of those campuses admitted thousands of applicants whose records demonstrated that they were less qualified than other applicants who were denied admission. Applicants' chances of admission were also unfairly affected by UC Berkeley's, UCLA's, and UC San Diego's failures to properly train and monitor the staff who review and rate applications. We found that staff were sometimes overly strict or overly lenient in their review of applications, thereby making the applicants' chances of admission unduly dependent on the individual staff who rated them rather than on the students' qualifications.

The Office of the President has allowed the weaknesses in these practices to persist because it has not conducted adequate oversight of campuses' admissions processes. Although it conducted an internal review of admissions processes after the recent nationwide college admissions scandal, the Office of the President relied heavily on campuses to review themselves and did not attempt to identify inappropriate admissions activity. Stronger standards and oversight are necessary to improve the university's ability to guarantee a fair and merit-based admissions process and to detect and prevent inappropriate admissions decisions.

Respectfully submitted,

ELAINE M. HOWLE, CPA
California State Auditor

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EXHIBIT 49

2 UC BERKELEY LAW SCHOOL DEAN, MR. Erwin Chemerinsky's PUBLIC TEACHING TO USE

3 RACE WHILE CONCEALING IT

4 <https://x.com/realchrisrufo/status/1674548940522549248>



5

6

7

8 <https://www.newyorker.com/news/our-columnists/the-sad-death-of-affirmative-action>

9 on

"What colleges [REDACTED] will need to do after affirmative action is eliminated is find ways to achieve diversity that can't be documented as violating the Constitution," Erwin Chemerinsky, the dean of the University of California, Berkeley, School of Law, told me. "So they can't have any explicit use of race. They have to make sure that their admissions statistics don't reveal any use of race. But they can use proxies for race."

1

EXHIBIT 50

2 **UC RIVERSIDE CHANCELLOR'S LETTER OF CENSURE TO PROFESSOR PERRY LINK**

3 [https://drive.google.com/file/d/1rlivgzTvMD1BeGMAZsFJou-5MXlhN97f/view?us](https://drive.google.com/file/d/1rlivgzTvMD1BeGMAZsFJou-5MXlhN97f/view?usp=p=drive_link)

4

p=drive_link



Office of the Chancellor
4108 Hinderaker Hall
900 University Avenue
Riverside, CA 92521

August 16, 2024

Professor Perry Link,

I write to impose discipline in the form of this Letter of Censure. This is my determination after carefully reviewing and considering the Hearing Committee Report ("Hearing Report") of the Committee on Privilege and Tenure ("the Committee") dated June 21, 2024, the hearing transcripts and exhibits/evidence, including the post hearing briefs from you and the administration, and the post-Hearing Report Letter from you and the Administration's response.

As outlined in my decision letter, to which this letter is attached, I conclude that clear and convincing evidence was presented in the hearing on this matter before the Committee on Privilege and Tenure establishing that you engaged in conduct that violated APM 015, Part II, Sections D.1 and C.5.

I issue this Letter of Censure pursuant to my authority under APM 016, Section II:

1. Written Censure A formal written expression of institutional rebuke that contains a brief description of the censured conduct, conveyed by the Chancellor. Written censure is to be distinguished from an informal written or spoken warning, and must be delivered confidentially to the recipient and maintained in a designated personnel file or files indefinitely or for a lesser period of time specified in the writing. Informal written or spoken warning is not an official disciplinary action.

Consistent with APM 016, this Letter of Censure will remain indefinitely in a confidential personnel file maintained by the Office of the Vice Provost for Administrative Resolution and will not be subject to disclosure unless permitted by applicable privacy laws and University policy.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim A. Wilcox".

Kim A. Wilcox
Chancellor

1

EXHIBIT 51

2

UC RIVERSIDE'S PERSECUTION OF PROFESSOR PERRY LINK

3

<https://www.wsj.com/opinion/uc-riversides-dei-guardians-came-after-me-39d8e2>

4 6e



The Wall Street Journal •

December 12, 2024 at 10:07 PM ·

...

From Wall Street Journal Opinion: UC Riverside's DEI guardians came after me. The university censured me after I spoke out against race taking over the faculty hiring process, writes Perry Link.



WSJ.COM

Opinion | UC Riverside's DEI Guardians Came After Me

The university censured me after I spoke out against race taking over the faculty hiring process.

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1 https://en.wikipedia.org/wiki/Perry_Link



This article needs additional citations for verification. Please help improve this article by adding citations to reliable sources. Unsourced material may be challenged and removed.
Find sources: "Perry Link" – news · newspapers · books · scholar · JSTOR (December 2024) (Learn how and when to remove this message)

Eugene Perry Link, Jr. (Chinese: 林培瑞; pinyin: Lín Péirùi; born 6 August, 1944 Gaffney, South Carolina) is Chancellorial Chair Professor for Innovative Teaching Comparative Literature and Foreign Languages in College of Humanities, Arts, and Social Sciences at the University of California, Riverside and Emeritus Professor of East Asian Studies at Princeton University. Link taught Chinese language and literature at Princeton University (1973-77 and 1989-2008) and UCLA (1977-1988). He specializes in modern Chinese literature and Chinese language.^[1]

Link is a Harvard University alumnus who received his B.A. in philosophy in 1966 and his Ph.D. in 1976. Link has been a Board Member of the Committee for Freedom in Hong Kong (CFHK) since 2021. CFHK is a US-based non-profit organisation, which presses for the preservation of freedom, democracy, and international law in Hong Kong.^[2]

Perry Link

Born 1944 (age 80–81)
Nationality American
Alma mater Harvard University
Scientific career
Thesis *The rise of modern popular fiction in Shanghai* (1976)

Chinese 林培瑞
Transcriptions [show]

Tiananmen Square [edit]

Link helped Chinese dissident Fang Lizhi and Fang's wife obtain refuge at the U.S. Embassy following the crackdown on the 1989 Tiananmen Square protests.^[3] Fang remained at the embassy for a year until negotiations resulted in Fang's being allowed to leave and settle in the U.S.^[3]

Link has translated many Chinese stories, writings and poems into English. Along with Andrew J. Nathan, he translated the *Tiananmen Papers*, which detailed the governmental response to the 1989 democracy protests. In 1996, China blacklisted Link, and he has been denied entrance ever since. In 2001, Link was detained and questioned upon arriving in Hong Kong because of his involvement in the *Tiananmen Papers*. After roughly one hour, he was allowed to enter Hong Kong, where he spoke at the Hong Kong Foreign Correspondents Club. He has been banned from the People's Republic of China since, however.^[4]

Controversy at U.C. Riverside [edit]

From 2022 to 2024, Link faced disciplinary action at U.C. Riverside after expressing concerns in a faculty search committee about prioritizing a Black candidate's race over qualifications.

Link was removed from the search committee and subjected to a disciplinary process, including hearings resembling a trial, where termination was suggested as a penalty.

Link said his comments were intended to caution against elevating race as the "overriding criterion," and that the comments were reported to the university without his knowledge.

Although a faculty committee unanimously found that Link did not violate any conduct codes, UC Riverside chancellor Kim Wilcox issued Link a formal letter of censure.^{[5][6][7]}

Link was recommended by the university to keep the process confidential and warned that the disclosure of any details of his disciplinary process "may result in discipline."

In December 2024, Link went public about his experience in an op-ed published in the Wall Street Journal.^[8]

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EXHIBIT 52

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UM AND UC WANT RACIAL PREFERENCE

3 [https://www.nytimes.com/2022/08/26/us/affirmative-action-admissions-supreme-c](https://www.nytimes.com/2022/08/26/us/affirmative-action-admissions-supreme-court.html)

4 [ourt.html](#)

The New York Times

Affirmative Action Was Banned at Two Top Universities. They Say They Need It.

As a Supreme Court case on college admissions nears, the California and Michigan university systems say their efforts to build diverse classes have hardly worked.

 Share full article  



The University of Michigan stated that despite "persistent, vigorous and varied efforts" to diversify its student body, the enrollment of underrepresented minority students has "fallen precipitously" at many of its schools. Joshua Lott for The New York Times



By **Stephanie Saul**

Published Aug. 26, 2022 Updated Oct. 31, 2022

5

EXHIBIT 53

UM's AMICUS BRIEF WITH THE US SUPREME COURT IN SFFA v. HARVARD

https://record.umich.edu/wp-content/uploads/2022/08/220804_AmicusBrief.pdf

21

array of initiatives to respond to such a disruptive change in the controlling law.

B. U-M's Sustained Race-Neutral Initiatives Have Not Achieved Racial Diversity In Enrollments

1. Despite U-M's demonstrated commitment to student body diversity, and despite having spent more than a decade successfully enrolling substantially more socio-economically disadvantaged students, race-neutral admissions policies have *not* significantly increased enrollment of underrepresented minorities. In 2006—the last admissions year before Proposal 2 took effect—underrepresented minorities made up 12.9% of U-M undergraduates.³⁸ By 2014, underrepresented minorities made up only 10.67% of undergraduates.³⁹ In recent years, underrepresented minority enrollment has recovered modestly from the decade of decline following Proposal 2. But in 2021, underrepresented minorities still represent only 13.46% of undergraduates, a slight (4%) increase from

University believes that those are the “students who will contribute the most to the robust exchange of ideas.” *Grutter*, 539 U.S. at 324 (internal quotation marks omitted). Admissions policies that consider only percentages would be antithetical to the University’s pedagogical goals by focusing on a single criterion (class rank) instead of seeking out students with a broad range of experiences. Moreover, because of the State’s demographics, a percentage plan would not yield a racially and ethnically diverse student pool for U-M. In Michigan, the statewide number of majority-minority schools is dwarfed by the number of schools that are heavily white. Hispanics and Native Americans are not a majority in *any* Michigan county or school district, and African-Americans constitute a majority only in the Detroit area. See *Gratz* Resp. Br. at 48-49. Thus, a percentage plan would have minimal or negative effects on racial diversity. And, of course, a percentage plan would not take into account U-M’s large pool of non-Michigan applicants.

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²

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EXHIBIT 54

2 **UM PRESIDENT SANTA ONO'S STATEMENT FOLLOWING SFFA v. HARVARD RULING**

3 <https://publicaffairs.vpcomm.umich.edu/key-issues/affirmative-action/>



• STAFF • KEY ISSUES • MEDIA TIPS

AFFIRMATIVE ACTION

Updated June 29, 2023

University Statement

To all members of the campus community,

The University of Michigan remains steadfast in its commitment to fostering a diverse educational environment for our students and scholars, which is essential to our core mission of academic excellence. Today as university leaders, we recommit ourselves to this value.

Although the U-M is not directly affected by the U.S. Supreme Court's decision to significantly narrow how race can be considered in admissions policies, we are deeply disheartened by the court's ruling.

4

EXHIBIT 55

UM PRESIDENT MARY SUE COLEMAN'S STATEMENT

3 [https://record.umich.edu/articles/u-m-dmission-policies-remain-unchanged-after-c](https://record.umich.edu/articles/u-m-dmission-policies-remain-unchanged-after-courts-ruling/)

4 [ourts-ruling/](#)

April 22, 2014

Share on: X f

U-M admission policies to remain unchanged after court's ruling

By Deborah Greene

Public Affairs

Topics: Campus News, State & Community

The university will not make any changes to admissions policies after Tuesday's decision by the U.S. Supreme Court upholding Proposal 2 of 2006, because U-M policies already are consistent with the state's ban on the consideration of race in college admissions.

The court ruled 6-2 that Proposal 2 was constitutional. The ruling came in the case of Schuette, Attorney General of Michigan v. Coalition to Defend Affirmative Action, Integration and Immigration Rights and Fight for Equality By Any Means Necessary (BAMN) et al.

In a statement, President Mary Sue Coleman and Provost Martha E. Pollack said:

"Our students and campus community have been working through very challenging issues this academic year in an important dialogue about race and diversity on campus. Our collective aspiration for a more and truly diverse campus will not waver.

"Despite this decision from the Supreme Court, the University of Michigan remains deeply committed to using every legal tool at our disposal to bring together a diverse study body.

EXHIBIT 56

NEW YORK TIMES ARTICLE ON DEI AT UNIV OF MICHIGAN

3 https://www.nytimes.com/2024/10/16/magazine/dei-university-michigan.html?url=https://www.nytimes.com/2024/10/16/magazine/dei-university-michigan.html&utm_source=nyt_magazine&utm_medium=link&utm_campaign=dei-university-michigan&utm_term=.JQYhgevN&smid=url-share

4 [locked_article_code=1.xk4.p_kk.Tm8_JQYhgevN&smid=url-share](https://www.nytimes.com/2024/10/16/magazine/dei-university-michigan.html?url=https://www.nytimes.com/2024/10/16/magazine/dei-university-michigan.html&utm_source=nyt_magazine&utm_medium=link&utm_campaign=dei-university-michigan&utm_term=.JQYhgevN&smid=url-share)

5 Part 1: UM's Identity-based hiring with race-neutral facade

Contrary to the school's disclaimers, it was almost universally understood among professors I spoke with that these programs were intended to generate racial and gender diversity without explicitly using affirmative action. At times, Chavous herself said as much. "One of the misconceptions about Prop 2 is that it inhibited our faculty searches by not allowing us to search based on race and gender or offer financial aid based on race and gender," she said at a Michigan D.E.I. event last year. "We just had to pivot to be more creative."

Got a confidential news tip? The New York Times would like to hear from readers who want to share messages and materials with our journalists.

[See how to send a secure message at nytimes.com/tips](#)

Michigan's application for federal funding for the biosciences program, which I obtained through a public-records request, states openly that "a major objective" of the program is to "recruit outstanding faculty whose social identities" will "lead to diversification of the biomedical and health sciences." Michigan's experience with the Collegiate Fellows program, the school attested, showed "that a high percentage of fellows" with "demonstrated commitments to D.E.I. are likely to come from traditionally minoritized groups."

Such reasoning extended well beyond the formal D.E.I. program. Professors across the university described to me how, in faculty meetings and on search committees, they had resigned themselves to a pervasive double-think around hiring. "The conversations would be had as if identity was not an issue," the former dean said. "Even though everyone knew it was."

¹ _____

² Part 2: Making admissions a “level playing field” is “career suicide” at UM

That same year, Chavous was promoted to chief diversity officer, succeeding her husband, who remains a professor at Michigan. In 2023, the university announced that it would expand Chavous’s Collegiate Fellows program. It would hire even more scholars “committed to diversity in the academy.” When I asked her how many of the fellows hired so far advanced right-leaning arguments about diversity or inequity, Chavous responded that the program favored “a commitment to broadening access, to engaging in equity in one’s discipline and field. So we’re not asking about any particular ideological or political stance.”

In practice, of course, those commitments can themselves be ideological stances. In a dissenting report to the committee urging Michigan to continue requiring diversity statements in hiring, Chandra Sripada, a professor of philosophy and psychiatry, argued that asking candidates to detail how they would advance equity inevitably required them to take particular positions about contested social issues. When Sripada asked Michigan colleagues to evaluate a hypothetical diversity statement that called for de-emphasizing “the axes of identity on which we differ” in classrooms and to make admissions a “level playing field,” one of them called it “career suicide.”

³

⁴

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2 Part 3: UM Collegiate Fellows were 80% people of color

In an interview, Chavous stressed that the program was carefully designed to comply with Proposal 2. "We wouldn't even want to hire people because of their identities," she said. "It's about their skills and competencies." Nevertheless, out of the 49 new faculty members subsequently hired through the program, 80 percent were people of color, according to a university spokeswoman. (In an interview last year, Chavous put the total even higher.) Their research interests included "the epistemic exclusion of diverse practitioners within the academy," critical food studies and how Indian transgender activists "appropriate normative U.S.-centric conceptions of gender rights as human rights." Last year, Sellers and Chavous helped create a \$79 million equity-hiring program in the health sciences. Similar programs have spread throughout the university. According to the school, about three-quarters of all departments in the College of Literature, Science and the Arts now employ at least one collegiate fellow.

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2 Part 4: UM students and faculties are silenced ("I can't say anything anymore")

Mark Bernstein, the university regent, told me he began to hear more and more concern from students and professors. "The cocktail chatter is: 'I can't say anything in class anymore. I'm going to get run out of class.' There's an enormous amount of fear."

Several months after the controversy over Collier's speech, Bernstein began working with the university's general counsel and a group of faculty members to draft a statement affirming support for intellectual diversity and freedom of expression. Every time they sent a draft to the administration, Bernstein recalled, it would come back with heavy markups from the D.E.I. office. "We would say, 'Students should expect to encounter uncomfortable ideas on campus.' And it would come back all sanded down and gobbledegook."

3

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EXHIBIT 57

2

UM'S DIVERSITY FAQ PAGE

3 <https://diversity.umich.edu/about/history/legal-context/>

Q: Can U-M replace race- and gender-conscious programs with ones that focus on socioeconomic status?



4

EXHIBIT 58

2 UM RANKED LAST IN ECONOMIC MOBILITY AND DIVERSITY AMONG ELITE PUBLIC COLLEGES

3 <https://www.michigandaily.com/news/administration/new-york-times-ranks-university-among-worst-socioeconomic-diversity/>

The Michigan Daily

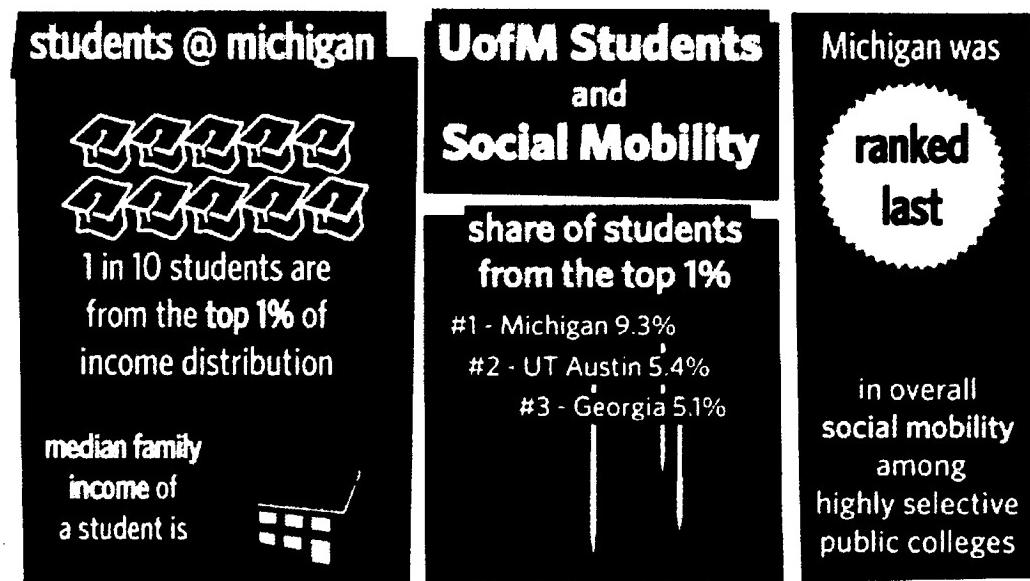
≡ Menu

ADMINISTRATION NEWS

University ranks last in economic mobility and diversity among elite public colleges

by Jennifer Meer

January 20, 2017



1

EXHIBIT 59

2

UM's USE OF IDENTITY QUESTION AND DESCRIPTOR PLUS

3 <https://cornellpress.manifoldapp.org/read/9e9716f6-b6cf-4861-9574-64c35eddb5>

4 [95/section/df1745a0-eced-41a9-96f1-46a52812fec8](#)

One month after Michigan voters passed Proposal 2, University of Michigan president Mary Coleman announced the Diversity Blueprints Task Force, headed by Provost Teresa Sullivan and Senior Vice Provost for Academic Affairs Lester Monts. Coleman, who replaced Bollinger in 2002, asked the task force to recommend new policies that would comply with Proposal 2 but still further the university's goal of diversity. Sullivan and Monts took advantage of the fact that postsecondary institutions in other states had already faced similar bans on affirmative action. By the time Michigan voters passed Proposal 2, public postsecondary institutions in California, Washington, Georgia, and Florida had all crafted "race-neutral" alternatives. Administrators in Texas also had experience in dealing with a court-ordered ban on affirmative action before *Gratz* and *Grutter* overturned *Hopwood* and allowed public universities in Texas to use race as a factor in admissions again. Sullivan and Monts organized a two-day workshop with representatives from the University of California-Berkeley, the University of Texas-Austin, and the University of Washington—all flagship public universities—to discuss how they responded to bans on affirmative action admissions practices in their own states.²

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UM's admissions office implemented many of the proposals that came out of the workshop. To evaluate students' contribution to campus diversity, admissions officers created essays about identity and life experiences. One essay, which was required of all students, asked applicants to respond to a prompt: "Everyone belongs to many different communities and/or groups defined by (among other things) shared geography, religion, ethnicity, income, cuisine, interest, race, ideology, or intellectual heritage. Choose one of the communities to which you belong, and describe that community and your place within it." An optional prompt asked students to "describe an experience that illustrates what you would bring to the diversity in a college community or an encounter that demonstrated the importance of diversity to you."³

The university also purchased a new program that offered proxies for race. The admissions office paid \$15,000 per year to use Descriptor Plus. The College Board developed the program to help schools "shape [their] class profile" and "[t]arget hard-to-attract populations," including minority students. The tool used College Board and U.S. census data to divide high schools into 180,000 different geographic neighborhood clusters, which have, what the College Board called, "unique behavior profiles." In short, the program divided high schools into neighborhood clusters with students that share similar SAT scores, college acceptance rates, incomes, and racial backgrounds. Using an applicant's information, University of Michigan admissions officers could search for whether an applicant went to an underperforming high school or lived in a neighborhood marked by "limited access to educational opportunities." The assumption, of course, is that a higher percentage of underrepresented minority students attend underperforming schools and, thus, could serve as a proxy for race.⁴

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EXHIBIT 60

2

ASIAN POPULATION GROWTH IN MICHIGAN

3 https://ippsr.msu.edu/sites/default/files/LLP/22/MI_Demographic_Trends.pdf

Michigan's Racial-Ethnic Composition, 2010 to 2020

- In 2020, Michigan's five largest racial-ethnic groups were non-Hispanic white (72.4%), non-Hispanic black (13.5%), Hispanic/Latino (5.6%), Two or More Races (4.4%), and non-Hispanic Asian (2.4%).
 - There are three counties where the American Indian and Alaska Native population comprises 10% or more of the total county population.
- Change in population from 2010 to 2020
 - Non-Hispanic White: -274,000 persons (-3.6%)
 - Non-Hispanic Black: -25,000 persons (-1.8%)
 - Non-Hispanic Asian: +96,000 persons (+40.5%)
 - Hispanic/Latino: +128,000 persons (+29.4%)

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2 <https://apiavote.org/wp-content/uploads/Michigan.pdf>

2022 AAPI VOTER DEMOGRAPHICS BY STATE

Michigan

POPULATION FACTS

- Largest Asian American ethnic groups in Michigan include: Asian Indian (124,878), Chinese, except Taiwanese (66,667), Filipino (41,435), Korean (36,983), Japanese (22,466) and Vietnamese (22,272)
- Largest NHPI ethnic groups in Michigan include: Native Hawaiian (3,053), Samoan (1,345) and Guamanian or Chamorro (1,186)
- From 2010 to 2020, the number of eligible AAPI voters in Michigan grew by 59%
 - This compares to a 4% change for the statewide eligible voting population over the same period.
- AAPI youth (ages 18-29) comprise 28% of the AAPI Citizen Voting Age Population (CVAP) in Michigan
- AAPIs age 50 and up comprise 36% of the AAPI CVAP.

188,548

ELIGIBLE AAPI VOTERS
(INCLUDES MULTI-RACIAL POPULATION)

2.5%

AAPI SHARE OF ELECTORATE IN THE STATE

419,878

AAPI POPULATION SIZE
(INCLUDES MULTI-RACIAL POPULATION)

97%

AAPI POPULATION GROWTH RATE SINCE 2000

41%

AAPI POPULATION GROWTH RATE SINCE 2010

EXHIBIT 61

UM ANN ARBOR CLASS PROFILE

3 https://obp.umich.edu/wp-content/uploads/pubdata/factsfigures/firstyearsprofile_u_maa_2024_10-22-24.pdf

UNIVERSITY OF MICHIGAN - ANN ARBOR FIRST-YEARS CLASS PROFILE

| | Fall 2020 | Fall 2021 | Fall 2022 | Fall 2023 | Fall 2024 |
|-----------------------------------|--------------|--------------|--------------|--------------|--------------|
| First-Years | | | | | |
| Applied | | | | | |
| Women | 31,635 | 39,365 | 42,004 | 44,024 | 50,209 |
| Men | 33,386 | 40,377 | 42,283 | 43,607 | 48,061 |
| Unknown | 1 | 1 | 2 | 1 | 40 |
| Total Applied | 65,022 | 79,743 | 84,289 | 87,632 | 98,310 |
| Offered Admission | | | | | |
| Women | 8,890 | 8,847 | 8,480 | 8,715 | 8,689 |
| Men | 8,084 | 7,224 | 6,434 | 7,007 | 6,678 |
| Unknown | 0 | 0 | 0 | 0 | 6 |
| Total Offered Admission | 16,974 | 16,071 | 14,914 | 15,722 | 15,373 |
| Enrolled | | | | | |
| Full-Time | | | | | |
| Women | 3,591 | 4,000 | 3,964 | 4,029 | 4,064 |
| Men | 3,244 | 3,251 | 3,060 | 3,397 | 3,188 |
| Unknown | 0 | 0 | 0 | 0 | 0 |
| Total Full-Time | 6,835 | 7,251 | 7,024 | 7,426 | 7,252 |
| Part-Time | | | | | |
| Women | 25 | 13 | 17 | 20 | 15 |
| Men | 19 | 26 | 9 | 20 | 10 |
| Unknown | 0 | 0 | 0 | 0 | 1 |
| Total Part-Time | 44 | 39 | 26 | 40 | 26 |
| Total First-Years Enrolled | 6,879 | 7,290 | 7,050 | 7,466 | 7,278 |

Includes first-time first-years from Spring and Summer terms still enrolled in the subsequent Fall term.

| | Fall 2020 | Fall 2021 | Fall 2022 | Fall 2023 | Fall 2024 |
|---|--------------|--------------|--------------|--------------|--------------|
| First-Years Enrollment by Race/Ethnicity | | | | | |
| African American | 235 | 309 | 338 | 432 | 450 |
| Hispanic American | 433 | 640 | 846 | 1,099 | 1,074 |
| Native American | 6 | 9 | 8 | 18 | 13 |
| Native Hawaiian/Pacific Islander | 2 | 2 | 7 | 12 | 11 |
| Asian American | 1,334 | 1,339 | 1,416 | 1,511 | 1,322 |
| White | 3,870 | 3,803 | 3,418 | 3,346 | 3,262 |
| Two or More URM | 108 | 143 | 154 | 208 | 223 |
| Two or More nonURM | 246 | 262 | 233 | 226 | 265 |
| International | 242 | 407 | 298 | 343 | 305 |
| Unknown | 403 | 376 | 332 | 271 | 344 |
| Total First-Years Enrolled | 6,879 | 7,290 | 7,050 | 7,466 | 7,278 |

| | Fall 2020 | Fall 2021 | Fall 2022 | Fall 2023 | Fall 2024 |
|--|--------------|--------------|--------------|--------------|--------------|
| First-Years Enrollment by Tuition Residency | | | | | |
| In-State | 3,542 | 3,639 | 3,667 | 3,849 | 3,848 |
| Out-of-State | 3,337 | 3,651 | 3,383 | 3,617 | 3,430 |
| Total First-Years Enrolled | 6,879 | 7,290 | 7,050 | 7,466 | 7,278 |

| | Fall 2020 | Fall 2021 | Fall 2022 | Fall 2023 | Fall 2024 |
|---|-----------|-----------|-----------|-----------|-----------|
| First-Years GPA/Standardized Test Scores | | | | | |
| High school GPA of enrolled first-years** | 3.8 - 4.0 | 3.9 - 4.0 | 3.9 - 4.0 | 3.9 - 4.0 | 3.9 - 4.0 |
| SAT-Verbal/Critical Reading/ERWS Scores** † | 660 - 740 | 680 - 760 | 670-750 | 670-750 | 680-750 |
| SAT-Math Scores** | 680 - 780 | 710 - 790 | 680 - 780 | 680 - 780 | 680 - 780 |
| Percent of class who submitted SAT scores: | 64% | 54% | 55% | 52% | 51% |
| ACT Composite Scores** | 31 - 34 | 32 - 35 | 31 - 34 | 31 - 34 | 31 - 34 |
| Percent of class who submitted ACT scores: | 48% | 32% | 24% | 18% | 18% |

**GPA and Test Scores shown for 25th and 75th percentile

† New SAT test and scoring system in place for first-years enrolled starting Fall 2017

| | Fall 2020 | Fall 2021 | Fall 2022 | Fall 2023 | Fall 2024 |
|---|-----------|------------|-----------|------------|-----------|
| First-Years who are National Merit Finalists | 88 | 113 | 88 | 102 | 72 |

EXHIBIT 62

ASIAN ADMITS AT UM (2024 vs 2023)

3 <https://www.michigandaily.com/news/administration/umich-student-enrollment-reach-record-high-in-fall-2024/>

4 [ches-record-high-in-fall-2024/](#)

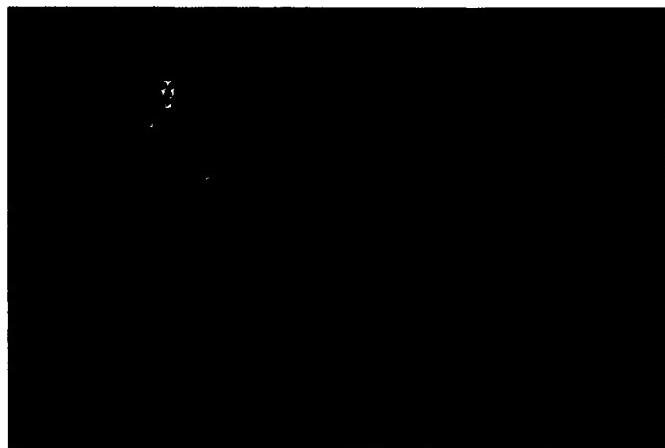
The Michigan Daily
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ADMINISTRATION

UMich student enrollment reaches record high in fall 2024

by Edith Pendell
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Design by Evelyn Musigian.

The University's fall 2024 enrollment of 52,855 students is the largest in the University's history. This includes 34,454 undergraduates, representing a 1.5% increase since 2023, while the 8,858 freshmen and transfer students within the undergraduate student body represent a slight decrease from the year prior. The first-year and transfer class in fall 2024 is composed of 6.1% African American or Black students, 13.3% Hispanic or Latine students, 0.2% Native American students, 0.1% Native Hawaiian or Pacific Islander students and 17.2% Asian American students. Comparably, the 2023 incoming first-year and transfer class was approximately 5.3% Black or African American students, 13.5% Hispanic, 0.2% Native American, 0.1% Native Hawaiian or Pacific Islander and 19.0% Asian American.

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SAT SCORE DISTRIBUTION

3 <https://reports.collegeboard.org/media/pdf/2023-total-group-sat-suite-of-assessm>

4 [ents-annual-report%20ADA.pdf](#) (page 7)

| Test Takers | Total Students | Female | Male | American Indian | Asian | African American | Hispanic | Native Hawaiian | White | Two or More Races |
|--------------------|----------------|---------|---------|-----------------|---------|------------------|----------|-----------------|---------|-------------------|
| | 1,913,742 | 966,726 | 936,481 | 15,384 | 194,108 | 225,954 | 462,186 | 3,791 | 752,632 | 69,410 |
| Total Score | | | | | | | | | | |
| 1400–1600 | 7% | 6% | 8% | 1% | 25% | 1% | 2% | 2% | 6% | 9% |
| 1200–1390 | 17% | 16% | 18% | 5% | 31% | 6% | 9% | 7% | 23% | 22% |
| 1000–1190 | 29% | 30% | 27% | 20% | 27% | 21% | 25% | 23% | 37% | 33% |
| 800–990 | 31% | 33% | 29% | 42% | 14% | 42% | 41% | 41% | 26% | 27% |
| 600–790 | 16% | 15% | 17% | 31% | 3% | 29% | 23% | 27% | 8% | 8% |
| 400–590 | 0% | 0% | 1% | 1% | 0% | 1% | 1% | 0% | 0% | 0% |

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